

Page 3

Defendants. )

Page 4

10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

Page 5	
1	INDEX
	PAGE
2	Appearances..... 2
3	
4	SONYA LACORE
5	EXAMINATION BY MR. PRYOR..... 7
6	Witness's Signature Page..... 63
7	Reporter's Certificate Page..... 66
8	EXHIBITS
9	NO. DESCRIPTION PAGE
10	3 - January 30, 2014 Email.....11
	13 - October 13, 2014 Email.....--
11	14 - October 13, 2014 Email.....--
	19 - President's Message - Social media, NEW
12	Android App and Contract Quickies.....35
	21 - February 24 2017 Email.....--
13	66 - February 22, 2017 Email.....37
	38 - Read Before Fly February 22, 2017.....39
14	26 - October 13, 2014 Email.....51
	67 - February 23, 2017 Email.....--
15	73 - February 23, 2017 Email.....--
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	

Page 6

1 THE VIDEOGRAPHER: We are going on the  
2 record June 24th, 2022 for the deposition of Sonya  
3 Lacore in a case styled Charlene Carter versus  
4 Southwest Airlines Company and Transport Workers  
5 Union of America, Local 556, Civil Case No.  
6 3:17-cv-02278-X, in the United States District  
7 Court for the Northern District of Texas, Dallas  
8 Division. The time is now 9:57.  
9 Will counsel state their appearances,  
10 locations, and agreements or stipulations for the  
11 record. Following will the court reporter please  
12 swear in the witness.  
13 MR. PRYOR: I'm Bobby Pryor and, along  
14 with Matt Gilliam, we represent Charlene Carter.  
15 MR. MCKEEBY: And this is Paulo  
16 McKeeby --  
17 MR. PRYOR: And I'm in, I'm in, I'm in  
18 Rockwall, sorry.  
19 MR. MCKEEBY: That's all right.  
20 MR. PRYOR: I forgot you were asking  
21 where we were.  
22 MR. MCKEEBY: And this is Paulo  
23 McKeeby. I represent Southwest Airlines, and I'm  
24 in my office in Dallas, Texas.  
25 MR. CLOUTMAN: This is Ed Cloutman,

Page 7

1 I'm one of the two lawyers here representing  
2 Transport Workers Union Local 556. I'm in Dallas.  
3 MR. GREENFIELD: This is Adam  
4 Greenfield. I'm the other attorney representing  
5 TWU Local 556, and I'm also at my home in Dallas.  
6 SONYA LACORE,  
7 having been first duly sworn, testified as  
8 follows:  
9 EXAMINATION  
10 BY MR. PRYOR:  
11 Q. Would you state your name, please?  
12 A. Sonya Lacore.  
13 Q. Ms. Lacore, my name is Bobby Pryor. I  
14 represent Charlene Carter in this matter.  
15 Who do you work for?  
16 A. I work for Southwest Airlines.  
17 Q. Are you represented by counsel today?  
18 A. Yes.  
19 Q. Who's your counsel?  
20 A. Paulo McKeeby.  
21 Q. And is that counsel also counsel for  
22 Southwest in this lawsuit, Southwest Airlines?  
23 A. I'm so -- I am sorry, I'm gonna have to  
24 see if I can get my volume up a little bit here  
25 today. Let me see. I'm having a hard time

Page 8

1 hearing you.  
2 Could you repeat?  
3 Q. Sure.  
4 Does the attorney representing you at  
5 this deposition today also represent Southwest  
6 Airlines --  
7 A. Yes.  
8 Q. -- in, in this lawsuit?  
9 A. Yes.  
10 Q. And are you paying for that attorney or is  
11 Southwest Airlines paying?  
12 A. I'm not paying for it.  
13 Q. And you don't think Southwest Airlines is?  
14 A. I, I don't really know. I don't know how  
15 that works.  
16 Q. Really?  
17 Okay. You just took an oath, correct?  
18 A. Yes.  
19 Q. And you take your oath seriously?  
20 A. Yes, I do.  
21 Q. You understand that a jury could be  
22 viewing your testimony today?  
23 A. That a -- I'm sorry, I'm having such a  
24 hard time hearing you.  
25 Q. Do you understand that a jury could be

<p style="text-align: right;">Page 9</p> <p>1 viewing your testimony today?</p> <p>2 A. Yes, I do.</p> <p>3 Q. Will you answer my questions truthfully,</p> <p>4 completely, and without evasion today?</p> <p>5 A. Yes.</p> <p>6 Q. And I'll ask you again, do you have any</p> <p>7 understanding of who is paying Southwest Airlines'</p> <p>8 attorneys in this matter?</p> <p>9 A. I sincerely don't know how that works.</p> <p>10 Q. If a Southwest employee sees another</p> <p>11 employee committing a violation of company policy,</p> <p>12 what should they do?</p> <p>13 MR. MCKEEBY: Object to the form of</p> <p>14 the question.</p> <p>15 You can answer.</p> <p>16 THE WITNESS: I'm sorry, what? Paulo,</p> <p>17 will you, Paulo, will you --</p> <p>18 MR. MCKEEBY: I, I made an objection,</p> <p>19 but you're free to answer that question.</p> <p>20 THE WITNESS: Oh.</p> <p>21 A. I, I would encourage an employee to report</p> <p>22 it.</p> <p>23 Q. What was your position when you were first</p> <p>24 hired by Southwest Airlines?</p> <p>25 A. Flight attendant.</p>	<p style="text-align: right;">Page 11</p> <p>1 A. I guess I would describe it as someone who</p> <p>2 is an active flight attendant serving in the role</p> <p>3 because of the dues they pay. So I would say</p> <p>4 that -- I would consider that active.</p> <p>5 Q. Were you aware in 2013 and early 2014 that</p> <p>6 there were two competing slates of candidates for</p> <p>7 offices for the Local 556?</p> <p>8 A. I don't recall what was happening that</p> <p>9 particular year. Could you be more specific?</p> <p>10 Q. Do you re -- do you recall that Audrey</p> <p>11 Stone was part of a group of candidates that ran</p> <p>12 against another group of candidates, lost, and</p> <p>13 then ended up being instated because the other</p> <p>14 candidates were, I don't know, disqualified or</p> <p>15 removed or --</p> <p>16 A. I remember --</p> <p>17 Q. -- complaints were brought against them?</p> <p>18 A. I do, I do recall some of that.</p> <p>19 Q. Okay. I'll, I'll tell you that was in</p> <p>20 2013, early 2014.</p> <p>21 Let me show you a document. I need</p> <p>22 the first one, I need Exhibit 3.</p> <p>23 (Exhibit 3 marked).</p> <p>24 Q. Okay. This is Exhibit 3 to Stone's</p> <p>25 deposition. Can you see this document?</p>
<p style="text-align: right;">Page 10</p> <p>1 Q. What year was that?</p> <p>2 A. 2001.</p> <p>3 Q. Were you at that time or subsequently ever</p> <p>4 a member of the union at Southwest Airlines,</p> <p>5 Local 556?</p> <p>6 A. Yes.</p> <p>7 Q. What years were you a member?</p> <p>8 A. 2001 to 2004.</p> <p>9 Q. Were you an active union member?</p> <p>10 A. Can you explain what you mean by active?</p> <p>11 Q. Someone who, I don't know, goes to</p> <p>12 meetings, serves on committees, assists --</p> <p>13 A. No.</p> <p>14 Q. -- in helping the union, serving as a</p> <p>15 director?</p> <p>16 A. No, I was not.</p> <p>17 Q. Okay. How would you define an active</p> <p>18 union member?</p> <p>19 A. Where my head automatically went was we</p> <p>20 have active and inactive employees, when they're,</p> <p>21 when they're working or not working, and so I just</p> <p>22 wanted to make sure that I understood that.</p> <p>23 Q. Okay. Then if you would go ahead and</p> <p>24 answer my question, how would you define an active</p> <p>25 union employee?</p>	<p style="text-align: right;">Page 12</p> <p>1 A. I cannot.</p> <p>2 Q. How about now?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. I'm gonna show you an e-mail from</p> <p>5 Audrey Stone to you in January 2014.</p> <p>6 Do you see that?</p> <p>7 A. I do.</p> <p>8 Q. Okay. I'm gonna read part of it and then</p> <p>9 ask you questions.</p> <p>10 A. Okay.</p> <p>11 Q. By the way, is this a -- is that -- is</p> <p>12 this a document you would receive in the regular</p> <p>13 course of your business as, as your position?</p> <p>14 A. Occasionally.</p> <p>15 Q. So what was your position in 2014?</p> <p>16 A. Hmm. I believe in 2014 I was a senior</p> <p>17 director of strategy and onboard experience.</p> <p>18 Q. Is that part of the inflight department or</p> <p>19 something else?</p> <p>20 A. Yes, it is part of the inflight</p> <p>21 department.</p> <p>22 Q. Tell the jury what inflight is.</p> <p>23 A. Inflight is a group that leads our flight</p> <p>24 attendants.</p> <p>25 Q. So this says, Sonya, Heads-up, we have a</p>

3 (Pages 9 to 12)

Page 13	Page 15
<p>1 movement of objectors, those that resign their 2 union membership and receive a small reimbursement 3 of their dues, and the board agreed that a 4 nonmember of 556 cannot represent TWU 556 on any 5 556 committee. 6 When she says "board" there, do you 7 understand her to be referring to the board of the 8 union? 9 A. I do. 10 Q. And then she says, Kent Hand is on CISM. 11 Do you know who Kent Hand is? 12 A. I do. 13 Q. Who's that? 14 A. A flight attendant. 15 Q. And it says, We instructed Eileen. 16 Do you know who Eileen is? 17 A. I do. 18 Q. Who's that? 19 A. Eileen leads our -- she's a flight 20 attendant, and she is also the chair of CISM. 21 Q. So she's in the union? 22 A. She's a member of the union because she 23 pays dues. She does not serve on their board. 24 Q. It says, We instructed Eileen to let him 25 know he couldn't serve on behalf of 556 anymore.</p>	<p>1 deal with it. Let me know if there is anything I 2 can do to assist. 3 Did I read that correctly? 4 A. Yes. 5 Q. And so if I understand correctly, the 6 president of the union reaches out to a member of 7 management at Southwest and says, we have 8 objectors, we have people that are objecting about 9 the union, and your response to her is, let me 10 know if there's anything I can do to assist, 11 correct? 12 A. That is what, that is what -- 13 MR. MCKEEBY: Object -- 14 A. -- I said here. 15 MR. MCKEEBY: Objection to the form of 16 the question. 17 Q. When you, when you say that's what it 18 says, is, is -- are you disagreeing with what you 19 wrote back on January 30 of 2014? 20 A. Not disagreeing at all. I'm, I'm -- I 21 don't know that -- well, I do know that what my 22 intent would have been was probably more related 23 to Kent Hand. 24 Q. To what? 25 A. To Kent Hand, the flight attendant.</p>
Page 14	Page 16
<p>1 He is trying to cause her problems. I wanted you 2 to be aware. I am going to try to follow up with 3 him tomorrow, and I'm happy to speak to you 4 further if you have any questions. Sorry to bring 5 you more union drama. 6 Do you know what she's referring to 7 when she says "more union drama"? 8 A. I honestly don't remember. That was so 9 long ago. 10 Q. And do you recall what you did in response 11 to this e-mail? 12 A. I do not. 13 Q. Look at the response that you sent her. 14 And this says, on January 30, the same day, and 15 it's Sonya Lacore at WNCO.com. Is that your 16 company e-mail address? 17 A. Yes, it is. 18 Q. It says, Hey there, thanks for the 19 heads-up. I definitely learned something today. 20 I wasn't aware there was such a movement. 21 So would that be accurate, that at 22 that time in January 2014, you didn't know 23 anything about an objector movement? 24 A. Yes. 25 Q. Okay. Then it says, I'm sorry you have to</p>	<p>1 Q. And so what were you going to do to assist 2 with Kent Hand, apply the -- 3 A. I -- 4 Q. -- the power of the company against an 5 objecting union member that's having problems with 6 the union? 7 A. No, sir. 8 MR. MCKEEBY: Object to the form of 9 the question. 10 You can answer. 11 Q. So what were you gonna do regarding Kent 12 Hand? Because you don't ask anything about what 13 is Kent Hand doing, do you? 14 A. When anything like this comes across my 15 desk, what I mean by assisting is I will pass it 16 off to someone on my team to research and explore, 17 and at that point I'm assuming that's what I did. 18 This was a very long time ago. 19 Q. Okay. So we can assume, since Southwest 20 has been asked to produce all documents about 21 this, that we're gonna see some documents at trial 22 that show us exactly what you just told us, right? 23 MR. MCKEEBY: Object to the form of 24 the question. 25 MR. PRYOR: I'm inviting, I'm inviting</p>

Page 17

1 Southwest to do that.  
2 MR. MCKEEBY: Thank you.  
3 Q. And so you, you be -- since you've raised  
4 that issue, we want the jury to be aware that  
5 that's what you're swearing to now. And,  
6 therefore, I'm sure we'll see the documents that  
7 support that.  
8 So you actually weren't saying what  
9 can I do to assist, you're saying what can I do  
10 about Ken -- Kent Hand. And so what did you do  
11 about Kent Hand?  
12 A. I don't remember.  
13 Q. Okay. So you asked what can I do to  
14 assist.  
15 By the way, did you know how many  
16 objectors there were at that time?  
17 A. I did not remember. I don't --  
18 Q. Did you --  
19 A. -- I don't know if I did.  
20 Q. Did you reach out to the objectors and  
21 offer them to do anything that Southwest could do  
22 to assist them?  
23 A. I don't recall doing any of that.  
24 Q. Okay. So if you did, I assume we would  
25 see those e-mails as well, correct?

Page 18

1 MR. MCKEEBY: Object to the form of  
2 the question. She doesn't know what was produced  
3 and not produced in the case.  
4 Q. Well, once again, ma'am, we're, we're  
5 willing to allow you to come -- Southwest can  
6 search all their files, we'll ignore any deadlines  
7 for documents, forgive any failure to produce, and  
8 we can't wait to see those documents at trial  
9 where you reached out to the objectors to offer  
10 them all the assistance you could provide. Okay?  
11 MR. MCKEEBY: Object --  
12 Q. You understand --  
13 MR. MCKEEBY: Objection to the form.  
14 Q. -- that we're making that offer to you?  
15 MR. PRYOR: Let me finish my question,  
16 Counsel.  
17 Q. Go ahead, ma'am.  
18 MR. MCKEEBY: Objection to the form --  
19 Q. Do you understand we're making --  
20 MR. MCKEEBY: -- of the question.  
21 Q. Do you understand we're making that offer  
22 to you?  
23 MR. MCKEEBY: You're making that offer  
24 to Southwest.  
25 But you can answer, if you understand.

Page 19

1 Q. Fair enough, but you can answer. You  
2 understand that's what I'm doing?  
3 A. I understand that you are doing what?  
4 What am I answering?  
5 Q. Now, that, that, that we're, we're looking  
6 forward to, since you -- this is the kind of, of  
7 service you would provide to all of the inflight  
8 flight attendants, whether they're objectors or  
9 not objectors, surely you wouldn't be favoring the  
10 union; that you reached out to the objectors and  
11 offered them all of the assistance you could  
12 provide as well, and I'm offering to let you prove  
13 to the jury that that is, in fact, what Southwest  
14 did.  
15 MR. MCKEEBY: Objection --  
16 Q. Do you underst --  
17 MR. MCKEEBY: -- compound. Object to  
18 the form of the question as compound and vague.  
19 You can answer.  
20 A. I sincerely don't know what I'm answering  
21 here. I really don't. I, I understand that you  
22 have something you're trying to say to me. I  
23 don't understand what, what you're asking.  
24 Q. I -- I'm, I'm saying you did not reach out  
25 to the objectors, and any indication that you did

Page 20

1 is untruthful under your oath, that's what I'm  
2 saying. You're disagreeing with that?  
3 MR. MCKEEBY: No --  
4 A. I --  
5 MR. MCKEEBY: -- she never made such  
6 a, she never made such a representation, Counsel.  
7 A. I, I don't remember.  
8 MR. PRYOR: She just said --  
9 A. But I don't --  
10 Q. You don't remember whether or not you  
11 reached out to an unknown number of objectors.  
12 Okay. So let's go to -- and see what  
13 -- let's see how Ms. Stone interpreted your  
14 e-mail. She says, Sonya -- this is her response  
15 to you -- You may want to leave your directors and  
16 let your -- leave your directors and base managers  
17 know as well that any nonmember of TWU may not be  
18 a representative of Local 556. And this says it  
19 would apply to all the meetings.  
20 Do you recall that?  
21 A. I don't recall it. It's so long ago.  
22 Q. Okay. If you -- do you know what you  
23 would have done in response to that? Would you  
24 have kicked off objecting members from committees  
25 of Southwest? You wouldn't have done that, right?

Page 21	Page 23
<p>1 MR. MCKEEBY: Objection --</p> <p>2 A. I --</p> <p>3 MR. MCKEEBY: -- to -- object to the</p> <p>4 form of the question. What committees are you</p> <p>5 talking about?</p> <p>6 MR. PRYOR: Any committee. Any</p> <p>7 committee --</p> <p>8 MR. MCKEEBY: Any committee.</p> <p>9 MR. PRYOR: -- any meeting, anything</p> <p>10 to do with Southwest where you're, you're -- she's</p> <p>11 saying we want these nonunion members off of</p> <p>12 anything to do with meetings with Southwest.</p> <p>13 MR. MCKEEBY: Yeah, so what's the</p> <p>14 question?</p> <p>15 MR. PRYOR: Unless you're directors</p> <p>16 and -- well, it's the question now.</p> <p>17 Q. So did you or did you not comply with her</p> <p>18 request?</p> <p>19 A. I don't recall what I did.</p> <p>20 Q. Do you think it would be appropriate to</p> <p>21 comply with her request?</p> <p>22 MR. MCKEEBY: Her request to, to, to,</p> <p>23 to kick union members off of committees?</p> <p>24 MR. PRYOR: As the request in the</p> <p>25 e-mail that we just read. It's on the screen.</p>	<p>1 kicked off committees and had to file a lawsuit in</p> <p>2 order to have their rights understood? You don't</p> <p>3 know that?</p> <p>4 MR. MCKEEBY: Well, she had -- ask her</p> <p>5 the question. She hadn't a -- said whether or not</p> <p>6 she knows it or not.</p> <p>7 A. I, I don't, I honestly don't remember what</p> <p>8 happened. There's a volume of work that comes</p> <p>9 across my desk. I don't remember 2014.</p> <p>10 Q. 2014, you don't remember if you</p> <p>11 disenfranchised hundreds of objectors and they had</p> <p>12 to file a lawsuit to protect their rights? You</p> <p>13 don't remember that; is that right?</p> <p>14 MR. MCKEEBY: Object, object to the</p> <p>15 form of the question as argumentative and vague.</p> <p>16 You can answer.</p> <p>17 A. I just don't remember what ha -- hundreds,</p> <p>18 I don't remember pe -- I don't remember names</p> <p>19 during that time. I don't remember any of that.</p> <p>20 Q. That's not the kind of thing you'd</p> <p>21 remember, correct?</p> <p>22 A. Please restate.</p> <p>23 Q. That's not the kind of thing you would</p> <p>24 remember because it was eight years ago, right?</p> <p>25 MR. GREENFIELD: Objection, form.</p>
Page 22	Page 24
<p>1 The jury can read it. She can read it.</p> <p>2 A. I can read it, yes. And what I would say</p> <p>3 about this is -- and I am -- I'll just be really</p> <p>4 transparent with you. I did not, especially in</p> <p>5 2014, did not understand everything about the, the</p> <p>6 rules and the policies of a union, 556</p> <p>7 specifically. So what I do know is that</p> <p>8 committees that we held were joint by the company</p> <p>9 and the union. And they -- if it was partially --</p> <p>10 because they're joint, they are paid for jointly.</p> <p>11 CISM is paid for jointly by Southwest and the</p> <p>12 union. So I don't -- I, I know that I didn't know</p> <p>13 a lot about policies then. So, quite honestly, I</p> <p>14 really don't remember what I did. That is, that</p> <p>15 is the honest truth.</p> <p>16 Q. So here's where she -- that's the same</p> <p>17 e-mail. And then we'll scroll up. And you</p> <p>18 forwarded this message from her to inflight</p> <p>19 directors.</p> <p>20 Do you see that?</p> <p>21 A. I do.</p> <p>22 Q. And do you know what happened as a result</p> <p>23 of that?</p> <p>24 A. I don't remember.</p> <p>25 Q. Do you know that objectors were, in fact,</p>	<p>1 A. I remember there being something going on.</p> <p>2 I do not remember all of the specifics.</p> <p>3 Q. Do you know as you sit here today whether</p> <p>4 or not the collective bargaining agreement permits</p> <p>5 Southwest and the union to agree to kick objectors</p> <p>6 off of joint company and union committees?</p> <p>7 A. I didn't understand it at that time. I</p> <p>8 know that I didn't.</p> <p>9 Q. I'm asking, do you understand it as you</p> <p>10 sit here today that you can't do that?</p> <p>11 A. I, I, I didn't know that. I don't.</p> <p>12 That -- I'm ...</p> <p>13 Q. You, you don't know that as you sit here</p> <p>14 today. What's your position today?</p> <p>15 A. Vice president.</p> <p>16 Q. Of what?</p> <p>17 A. Inflight operations.</p> <p>18 Q. That's a very senior position, correct?</p> <p>19 A. Yes, sir, it is.</p> <p>20 Q. You have thousands of people under your</p> <p>21 purview, correct?</p> <p>22 A. I do.</p> <p>23 Q. And at least 16,000 of them or so, maybe</p> <p>24 fifteen thou -- are, are union members, and you</p> <p>25 don't know the answer to that question as you sit</p>

Page 25	Page 27
<p>1 here today, correct?</p> <p>2 MR. MCKEEBY: What, what question?</p> <p>3 MR. PRYOR: The question of does she</p> <p>4 know whether or not she can still assist the union</p> <p>5 in kicking people off of committees, nonunion</p> <p>6 objectors.</p> <p>7 Q. Do you know?</p> <p>8 A. I have a team of experts that work on</p> <p>9 that, and so I delegate every bit of that work.</p> <p>10 They --</p> <p>11 Q. Let's look at Exhibit --</p> <p>12 A. -- they will know.</p> <p>13 Q. Oh, I'm sorry.</p> <p>14 Okay. You, you rely on someone else</p> <p>15 for that, correct?</p> <p>16 A. That is correct.</p> <p>17 Q. Who is Brian -- how do you pronounce his</p> <p>18 last name, Talburt?</p> <p>19 A. Brian is a flight attendant.</p> <p>20 Q. Okay. And someone that you knew certainly</p> <p>21 back as of 2014, correct?</p> <p>22 A. Yes.</p> <p>23 Q. Did you know him before then?</p> <p>24 A. Yes. Flight attendant in Phoenix.</p> <p>25 Q. So how long had you known him? How long</p>	<p>1 A. Corliss is a flight attendant and also</p> <p>2 currently serves on, on the union team.</p> <p>3 Q. And he says, The attitude she spawns is</p> <p>4 Northwest Airlines in the '80s. People listen and</p> <p>5 people read.</p> <p>6 Do you know how what he's talking</p> <p>7 about, how she's dangerous, incredibly dangerous?</p> <p>8 A. I don't know what he -- I, I can't assume</p> <p>9 what he meant.</p> <p>10 Q. Okay. I'm asking how you understood it.</p> <p>11 Let's try that.</p> <p>12 A. Brian is someone who -- frequent pen pal,</p> <p>13 and he is very passionate when he doesn't agree</p> <p>14 with things that people do or say, and so I can</p> <p>15 only assume that's what he meant.</p> <p>16 Q. He says -- then he says, I am all about</p> <p>17 targeted assassinations.</p> <p>18 Now, if you read this e-mail, maybe</p> <p>19 you'll remember that, maybe that will help you</p> <p>20 recall, but he's talking about targeted</p> <p>21 assassinations using social media.</p> <p>22 Do you recall that?</p> <p>23 MR. MCKEEBY: What, what, what is it?</p> <p>24 Where is that? Where does it say social media?</p> <p>25 MR. PRYOR: Go to the next paragraph.</p>
Page 26	Page 28
<p>1 have you known him as you sit here today, I guess?</p> <p>2 A. I probably met him when I was a leader in</p> <p>3 the Phoenix space in 2007 or 2008.</p> <p>4 Q. Okay. So do you recognize this e-mail,</p> <p>5 the portion that's on the screen?</p> <p>6 A. I -- Brian sent me a lot of e-mails. So I</p> <p>7 can read it right now, but I don't remember.</p> <p>8 Q. I'm gonna read it to you.</p> <p>9 You didn't -- you haven't seen this</p> <p>10 document in the last few days?</p> <p>11 A. No, sir.</p> <p>12 Q. So, first of all, I note that he sends it</p> <p>13 to a different e-mail address than the one you</p> <p>14 identified as your business address before,</p> <p>15 correct?</p> <p>16 A. Yes.</p> <p>17 Q. All right. And he says, So my final</p> <p>18 installment on this subject. Shipman stepped up</p> <p>19 to the plate. It is maddening trying to reason</p> <p>20 with these sheeple. The issue becomes the tumor.</p> <p>21 Then he goes on to say -- I'm going to</p> <p>22 read a couple of lines down -- Corliss</p> <p>23 particularly is something we have not seen before</p> <p>24 and is incredibly dangerous.</p> <p>25 Who is Corliss?</p>	<p>1 Q. Social media is by far the major source of</p> <p>2 reach and must be used to our advantage.</p> <p>3 He's talking about using social media</p> <p>4 for targeted assassinations. You don't recall</p> <p>5 that?</p> <p>6 MR. GREENFIELD: Objection, form.</p> <p>7 A. I don't remember this. I --</p> <p>8 Q. Okay.</p> <p>9 A. What I can tell you is Brian later got</p> <p>10 into some challenges with his own social media</p> <p>11 posts, and I know my team investigates that.</p> <p>12 Q. Well, you certainly didn't have them</p> <p>13 investigate this one, the one he sent you, did</p> <p>14 you?</p> <p>15 A. I don't remember if I did or not.</p> <p>16 Q. Oh. So --</p> <p>17 A. I get a lot of e-mail.</p> <p>18 Q. -- once again, we look forward to</p> <p>19 Southwest showing us the documents where you</p> <p>20 reported him for this comment. I want to read</p> <p>21 something else in here.</p> <p>22 MR. MCKEEBY: Object to the sidebar.</p> <p>23 Q. In that same paragraph about --</p> <p>24 MR. MCKEEBY: Just ask, ask the</p> <p>25 witness questions, please.</p>

7 (Pages 25 to 28)

Page 29	Page 31
<p>1 MR. GREENFIELD: Objection to the 2 form -- 3 Q. -- about -- 4 MR. GREENFIELD: -- as well. 5 Q. -- about targeted assassinations. 6 I am sure with her dreadful work 7 history there could be opportunity -- he's talking 8 about an opportunity to fire her, isn't he, and 9 he's talking to you, a member of senior 10 management, true? 11 A. Apparently. 12 Q. Yes? 13 A. Yes, he is talking to me in this e-mail. 14 Q. Okay. I didn't say -- I'll take your yes. 15 I didn't ask you if he's talking; he obviously 16 wrote the e-mail. You answered my question. 17 Now, he goes on to say, She will play 18 very well to the heavy inner city minority crowd 19 coming on board soon. She will be their voice. 20 She will be a huge threat in our unco -- our 21 upcoming election as well. 22 That's racist, isn't it? I'm sure you 23 reported that. 24 MR. MCKEEBY: Object to the form of 25 the question as compound and argumentative.</p>	<p>1 A. I, I will. I will like to just read over 2 it again. 3 I -- are you, are you mi -- are you 4 referencing the minority crowd part? 5 Q. I'm referencing what I read, but you just 6 read that paragraph. Tell us whether or not you 7 think these are racist comments. 8 A. I, I, I don't see it as racist, but -- 9 Q. Okay. 10 A. -- maybe you do. I don't. 11 Q. And so he's talking about -- then in the 12 next paragraph, he's talking about how social 13 media can use -- be used, and in the paragraph 14 below that he says, I would highly encourage 15 targeting people. 16 And he sent this to you; what did you 17 do in response? 18 A. I don't remember what I did. 19 Q. Okay. By the way, he says at the end, he 20 says, I've sent this to your personal e-mail. I 21 totally get the paper trail thing, nobody can be 22 fully trusted except me. 23 Is that what he's doing, he's sending 24 you -- by the way, he said final installment. 25 This is the only e-mail we've received. Where are</p>
Page 30	Page 32
<p>1 MR. PRYOR: Okay. We'll go to the 2 first one. 3 MR. MCKEEBY: What's the question? 4 Q. That's racist, what -- isn't it? 5 A. I'm reading this for the first time. 6 Q. You don't think it's, you don't think it's 7 racist? 8 A. I'm asking you -- 9 MR. MCKEEBY: You asked -- let her 10 answer the question, Counsel. 11 A. I'm asking you -- 12 MR. MCKEEBY: She's reading it, and 13 she's gonna answer the question. 14 Q. I just read it to you, ma'am. You want me 15 to read it again? I'm on a limited time. Is that 16 what we're doing? I just read it to you and it's 17 in front of you. And -- 18 MR. MCKEEBY: Let -- if you can let 19 her -- 20 Q. -- you can tell us if this is racist. 21 A. It's -- 22 MR. MCKEEBY: She could, she could 23 tell you if you'd give her the opportunity. 24 A. Yeah. 25 Q. Please do.</p>	<p>1 the other installments? Have you seen them? Do 2 you know anything about that? 3 MR. MCKEEBY: Object to the form of 4 the question. It's compound. 5 You can answer. 6 Q. Do -- 7 MR. PRYOR: I'll uncompound it. 8 Q. He says -- 9 MR. MCKEEBY: Thank you. 10 Q. -- this is my final installment. 11 Do you recall how many installments 12 there were? 13 A. I do not. 14 Q. So did you -- the jury will be able to 15 have this; we read part of it to them. Do you 16 interpret this as Brian saying, Let's use social 17 media to target people we want to get rid of to 18 help -- and he phrases it our union, our upcoming 19 election. Do you interpret it that way as well? 20 A. I, I don't. And if, if you don't mind, 21 I'd like to say why. Because it was not -- 22 Q. Sure. 23 A. -- un -- it was not uncommon for Brian -- 24 this is one of many e-mails that Brian would send 25 on whatever the topic of the week was for him.</p>

Page 33

1 And so I honestly began to take his e-mails  
2 very -- just a little bit too passionate, and if  
3 you -- I, I actually do not interact with him  
4 anymore at all for that reason.  
5 Q. Well, he says he's interacting with you on  
6 October 13th. Not too long after that, he sends  
7 an e-mail to Ms. Stone, it's Exhibit -- Trial  
8 Exhibit 26, and he says, I found this. It really  
9 has nothing to do with the topic at hand, but it's  
10 an illustration of casual behind the scenes  
11 conversations we have and particularly re: social  
12 media. I along with Mike and Sonya had a meeting  
13 last summer with VdV to discuss social media as a  
14 tool together -- all caps -- with management and  
15 FAS to deliver and reinforce messages.  
16 Do you recall that?  
17 A. I, I don't recall this e-mail. I recall  
18 that meeting.  
19 Q. Is he, is he lying when he says that's  
20 what you were doing?  
21 MR. MCKEEBY: Well, objection. These  
22 --  
23 You can answer.  
24 A. I will tell you what the meeting was  
25 about.

Page 34

1 Q. No, I'm asking you if he's lying in this  
2 e-mail. I didn't ask about the meeting. Is he  
3 telling the truth in what I just read in that  
4 e-mail?  
5 MR. MCKEEBY: Object to the form of  
6 the question.  
7 You can answer.  
8 A. Is he telling the truth that he had a  
9 meeting with us, yes.  
10 Q. So is anything that I read to you that he  
11 said not true?  
12 A. I'm just rereading it. If you'll give me  
13 a moment.  
14 MR. MCKEEBY: And, Counsel, what part  
15 are you asking her about, the first paragraph  
16 here?  
17 MR. PRYOR: The part that I just read.  
18 MR. MCKEEBY: And what is that, the  
19 first paragraph?  
20 A. Yeah, I'm ...  
21 MR. PRYOR: It's most of the first  
22 paragraph.  
23 A. I'll tell you what, let's do this, because  
24 I'm not trying to be difficult here, and I think  
25 you feel that I am. If you could tell me exactly

Page 35

1 which part, then I'm happy to answer the question.  
2 Q. Okay. So I -- I've, I've read it, it's in  
3 front of you. I've asked it twice, and I'm on a  
4 limited time schedule. And nothing I've -- well,  
5 let's try it this way. Nothing I've read to you  
6 from this e-mail struck you, when I read it to  
7 you, that, wow, that's not true, did it? Surely  
8 if you hear something untrue, that strikes you,  
9 right?  
10 A. If I hear something untrue, yes. But  
11 there is a, there is a --  
12 Q. Let's go to Exhibit -- go to Exhibit 19.  
13 If I can ...  
14 (Exhibit 19 marked).  
15 Q. This is -- that's not the one I want, but  
16 I'm going to find. There it is.  
17 MR. MCKEEBY: There it is.  
18 Q. This Exhibit 19 is a message from Audrey  
19 Stone, as president of the union, to the flight  
20 attendants.  
21 Do you see these messages? Do you get  
22 those?  
23 A. Excuse me, I only get them if someone  
24 sends them to me.  
25 Q. Do you, do you, do you regularly get

Page 36

1 these?  
2 A. Not regularly, no.  
3 Q. Okay. Do you recall a President's Message  
4 from Ms. Stone where she said she was working with  
5 Southwest Airlines to make their social media  
6 policy not so ambiguous? Do you recall that?  
7 A. I recall her talking with us about that.  
8 Q. Okay. And she also says in there that  
9 most of the complaints from social media have been  
10 flight attendants complaining about flight  
11 attendants, and she encourages them not to do  
12 that, to keep it in-house.  
13 Did she discuss that with you, or do  
14 you recall that?  
15 A. I don't remember the in-house part, but I  
16 do remember us having discussions, especially her  
17 with Mike, around -- this was the -- this was kind  
18 of the beginning of the social media activity with  
19 our group. And I, I do recall that we were having  
20 multiple challenges with people posting, and we  
21 were trying to navigate how to best handle that,  
22 because it was, it was new to all of us.  
23 Q. So Exhibit --  
24 THE REPORTER: I'm sorry, it was what?  
25 I'm sorry, it was what?

Page 37

1 THE WITNESS: It was new to all of --  
2 it was just kind of a new arena that our flight  
3 attendants were engaging in more frequently than  
4 they ever had.  
5 Q. Exhibit 66 is Audrey Stone's complaint to  
6 Southwest Airlines about Charlene Carter, and you  
7 are copied on that e-mail.  
8 (Exhibit 66 marked).  
9 Q. It's February 22, 2017. Do you recall  
10 that?  
11 A. I don't -- I, I don't recall everything  
12 that's in this. I -- but I, I do see that I'm  
13 copied.  
14 Q. So is it standard policy at Southwest  
15 Airlines that when someone wants to make a  
16 complaint about another employee, that they not  
17 only include their base manager, but the vice  
18 president of inflight services; is that, is that  
19 what standard process is?  
20 A. I wouldn't say --  
21 MR. MCKEEBY: Object to the form of  
22 the question.  
23 You can answer.  
24 A. I wouldn't say it's standard. I think it  
25 depends on the person who files it. Some, some

Page 38

1 people do, some people don't.  
2 Q. So you typically then receive -- every  
3 time someone has a complaint about a, a coworker,  
4 they typically include you on those e-mails,  
5 correct?  
6 MR. MCKEEBY: Objection.  
7 A. That's not --  
8 MR. MCKEEBY: Mischaracterizes her  
9 testimony.  
10 You can answer.  
11 A. That's not correct. That's not, that's --  
12 Q. Okay.  
13 A. -- not every time.  
14 Q. But, but that's what Audrey Stone did,  
15 isn't it, the person that you were working with on  
16 social media, the person you were -- had  
17 corresponded with Brian about targeted  
18 assassinations, right?  
19 MR. MCKEEBY: Object to the form of  
20 the question.  
21 You can answer.  
22 A. She copied me here. I'm not -- that's  
23 not -- some people do, some people don't. That's  
24 -- with, with such a large group, it depends on  
25 the person.

Page 39

1 Q. And, and most people also include someone  
2 like Naomi Hudson. Who's Ms. Hudson?  
3 MR. MCKEEBY: Objection to the form.  
4 MR. GREENFIELD: Objection to the  
5 characterization.  
6 MR. MCKEEBY: You can answer.  
7 A. Naomi Hudson is for -- no longer works for  
8 us, but she worked for us in the labor  
9 negotiations and also the labor relations team.  
10 Q. So the person that negotiates with the  
11 union -- by the way, Audrey Stone was on that  
12 negotiating committee at that time in 2017, wasn't  
13 she?  
14 A. I believe so.  
15 Q. And she includes the person that  
16 negotiates union contracts on her complaint. Is  
17 that something that gets normally done as well?  
18 A. I can't answer that. I don't know.  
19 Q. Let's look at Exhibit 38.  
20 (Exhibit 38 marked).  
21 Q. The very same day -- let's go back to  
22 Exhibit 19. That was sent out at -- 66, I'm  
23 sorry. It was sent out at around 9 o'clock  
24 Central Time.  
25 That very same day, February 22nd, you

Page 40

1 sent out Read Before Fly, and it's a Read Before  
2 Fly just before Ms. Stone makes her complaint,  
3 warning people about violations of social media  
4 policy. Do you see that?  
5 A. Yes.  
6 Q. And that's just a coincidence, right?  
7 A. We were dealing with multiple issues at  
8 that time, so I can't tell you what was in my head  
9 at the time that I wrote this, but I can tell you  
10 that all of the people who authored this, we were  
11 the ones having to do the volume of work with  
12 multiple social media, which is why we, to my  
13 point earlier, we felt like it was time for us to  
14 really educate our group because they -- we owed  
15 it to them to let them know that we have a, a firm  
16 policy.  
17 Q. And it's just happenstance that it was the  
18 same day that Audrey Stone made her complaint,  
19 right?  
20 A. I don't know that it was happenstance. I  
21 think we were all talking about this for months.  
22 Q. Did you talk to Audrey Stone about her  
23 complaint?  
24 A. I never reached out to her to talk to her  
25 about it. Did she try to share some of it with me

<p style="text-align: right;">Page 41</p> <p>1 at times, possibly. I don't remember. She 2 talked al -- we -- any time you have -- 3 MR. MCKEEBY: Yeah, yeah, you've told 4 her (sic) you don't remember. 5 MR. PRYOR: Wait, what was that? 6 Don't, don't instruct the witness how to answer a 7 question. I don't know who did that. 8 MR. MCKEEBY: I -- 9 MR. PRYOR: That's inappropriate. I 10 object. 11 MR. MCKEEBY: That was -- that -- 12 okay. Objection noted, and it was Mr. McKeeby. 13 I'm just advising the witness that she's answered 14 your question. 15 MR. PRYOR: Okay. I -- that's -- 16 we'll reserve all rights. Okay. 17 MR. MCKEEBY: All rights as -- 18 Q. And let's look at -- 19 MR. PRYOR: All rights -- no, to take 20 appropriate action for improperly instructing a 21 witness during a sworn deposition. 22 MR. MCKEEBY: I understand you're 23 reserving all rights. 24 MR. PRYOR: Okay. 25 Q. So let's look at February 23rd, this same</p>	<p style="text-align: right;">Page 43</p> <p>1 Exhibit 21. 2 MR. MCKEEBY: Right. Understood. 3 Q. Okay. So, so look, look here. Okay. 4 Let's try -- how about this one, this is an e-mail 5 in which they talk about all of the information 6 that was just discussed that Brian provided, and 7 look at this e-mail. It's against Jeanna Jackson, 8 Beverly Berlander, Michelle Foley, Charlene 9 Carter, Greg Hofer, Mol -- I mean, we can go 10 through this, the jury will get it. The -- and 11 all these people that he went through their 12 Facebook posts and provided this to management, 13 just like he talked about with you, and every 14 single one of them is a union objector or a 15 union -- opposed to the union leadership, and you 16 know nothing about this, correct? 17 A. I don't -- 18 MR. MCKEEBY: Object to the 19 characterization. 20 You can answer his -- the very last 21 part of what he said, which was the question, 22 which is whether or not you know about this. 23 A. I, I don't, I don't remember any of this. 24 And I'm not copied on this e-mail. 25 Q. So you, you don't think you're on any of</p>
<p style="text-align: right;">Page 42</p> <p>1 time period, it's Exhibit 21, I've got to find it, 2 it's SWA 44. 4484, here we go. 3 So February 22nd, we have these -- 4 this strange coincidence. And then on 5 February 23rd, this is Julie O'Grady to Maureen 6 Emlet and others saying: Deborah Edwards and I 7 received the attached e-mails from Brian 8 containing additional social media posts. We can 9 review this information and determine next steps. 10 Is this another coincidence, or is 11 this the targeted -- 12 MR. MCKEEBY: Object to the -- 13 Q. -- assassination that you and Brian 14 e-mailed about? 15 MR. MCKEEBY: Object to the form of 16 the question. And object to the characterization. 17 You can answer. 18 A. I have no idea. 19 Q. You know nothing about this, correct? 20 A. I don't remember this at all. 21 Q. Let's see if you remember some of the 22 others, then. Let's go to 655, the same exhibit. 23 MR. MCKEEBY: What is the number on 24 this exhibit, please? 25 MR. PRYOR: 21. It's the Trial</p>	<p style="text-align: right;">Page 44</p> <p>1 these e-mails; is that right? 2 A. I, I don't remember if I am. I, I don't 3 know any other way to state that to you. 4 MR. MCKEEBY: She just said she's not 5 on this one. 6 MR. PRYOR: No, I -- 7 Q. You -- it's -- is it your testimony you 8 never received e-mails with this information in 9 it? 10 A. That -- I, I can't say that because I 11 don't know. I don't know which e-mails you're 12 referring to. I'm telling you I don't -- 13 Q. Well, if you -- 14 A. -- remember. 15 Q. If you received this information, surely, 16 knowing that Brian had talked to you about social 17 media and targeted assassinations, you would have 18 said something, wouldn't you, you would have told 19 the people, hey, wait a minute, you guys need to 20 be aware of what he's up to here; you would -- 21 MR. MCKEEBY: Object -- 22 Q. -- have done that, right? 23 MR. MCKEEBY: Object to the form of 24 the question. It's a hypothetical. 25 You can answer.</p>

Page 45	Page 47
<p>1 A. I think it would have depended on all of 2 the details of what I would have done with that. 3 I am seeing this now for the first time, so I, I 4 don't -- I can't really say what I would do. 5 Q. By the way, who is Julie O'Grady? 6 A. Julie wor -- I believe that she worked in 7 employee relations. 8 Q. And she says, At this time, I do not have 9 the specific page or wall where this content was 10 found. Please work with labor relations and your 11 HR business partner to address this matter. 12 Why would anyone be referring this to 13 labor relations unless you were trying to help the 14 union with people that didn't like the union? 15 A. I -- 16 MR. MCKEEBY: Object to the form of 17 the question as -- 18 Q. I -- I'm giving, I'm giving you the chance 19 to come up with any explanation you can think of 20 for -- 21 MR. MCKEEBY: She's -- 22 Q. -- Southwest management. 23 MR. MCKEEBY: She's already testified 24 she doesn't -- hasn't seen this e-mail. She's not 25 the -- she's not a recipient.</p>	<p>1 in many roles. So I'm not sure what role she was 2 in here. Oh, manager of labor relations. 3 Q. And do you see this e-mail from her 4 regarding the social media posts where she says, I 5 couldn't find much with Greg's name on it. 6 Do you know who Greg is? 7 A. I don't know who she's talking about right 8 here. 9 Q. Okay. But I'm happy to keep looking. I 10 did take screenshots of his most recent posts, and 11 I think there's an interesting pattern of trying 12 to milk the company for money and topple the 13 union. Do you want me to dig further? 14 You know nothing about this e-mail? 15 A. I do not. 16 Q. What would you have done with this e-mail 17 if you had received it? 18 A. I would send it to my team and let them 19 determine what the next steps are. 20 Q. 84 -- 6351. 21 Were you involved or receive any 22 information about the Step 1 or Step 2 process 23 involving Charlene? 24 A. I'm not involved in the process. 25 Q. So what involvement did you have?</p>
Page 46	Page 48
<p>1 So you can answer as best you can. 2 A. I can't even begin to know what Julie was 3 saying because I, I didn't this write e-mail. 4 Q. Would you have directed to labor 5 relations -- if, if, if Brian Talburt had sent you 6 an e-mail with all these union objectors on there 7 that he's been searching their Facebook pages and 8 wants Southwest to take action against them, and 9 knowing what you know from his targeted 10 assassination e-mail with you, would you have sent 11 it to labor relations? 12 A. I would -- 13 MR. MCKEEBY: Object to the form as 14 hypothetical. 15 You can answer. 16 A. I would send it to my team of experts that 17 work on that, because I have a team that's very 18 good at this. And I -- honestly, that's why 19 sometimes I will do an FYI and let them take it 20 from there. 21 Q. Who's Maureen Emlet, or I may have said 22 the wro -- yeah, Maureen Emlet? 23 A. Are you asking me who she is? 24 Q. I am. 25 A. She was a base manager -- well, she served</p>	<p>1 A. What about what? 2 Q. You just said -- 3 A. I couldn't hear you. 4 Q. -- not that aspect. What are you -- you 5 said not that aspect, and I said, okay, what 6 aspect did you have involvement? 7 A. I said I'm not involved in the prospect -- 8 in the process of Step 1, Step 2 hearings. 9 Q. Okay. And so, therefore, when you said 10 not involved in that aspect, did you mean to 11 indicate you were involved in some other aspect? 12 A. I'm not involved in the pro -- in those 13 processes. Do people come and let me know that 14 there is a, a case going on, maybe, maybe not. 15 Depends. But I, I intentionally do not involve 16 myself in the process. 17 Q. Did you search your personal e-mails for 18 all e-mails you had with Brian Talburt for 19 production in this lawsuit? 20 A. Did I search my what? I -- I'm sorry, I'm 21 having really a tough time -- 22 Q. Your, your pers -- and I'm sorry. 23 Did you search your personal e-mails 24 to produce in this lawsuit all e-mails you had 25 with Brian Talburt?</p>

12 (Pages 45 to 48)

<p style="text-align: right;">Page 49</p> <p>1 A. I, I did not.</p> <p>2 Q. What's your education?</p> <p>3 A. What's my education?</p> <p>4 Q. You don't need to repeat the question</p> <p>5 unless you just didn't hear it.</p> <p>6 A. I shouldn't --</p> <p>7 MR. MCKEEBY: Well, she didn't hear</p> <p>8 it. She didn't hear it. That's why she repeated</p> <p>9 it.</p> <p>10 A. I'm not, I'm not trying to be difficult</p> <p>11 here. I'm really having a challenge hearing you,</p> <p>12 and I wanted to make sure that I understood you.</p> <p>13 So if you're asking me what my</p> <p>14 education is, I have a high school education and</p> <p>15 two years of college. I do not have a college</p> <p>16 degree.</p> <p>17 Q. Why can you not be at trial in this case?</p> <p>18 A. I have some commitments that I had</p> <p>19 previously prepared for, and it just is really</p> <p>20 difficult for me to be away.</p> <p>21 Q. By the way, I had some commitments too.</p> <p>22 I, I changed them. Tell me about your</p> <p>23 commitments.</p> <p>24 A. I'm happy to. The, the first week -- I'm</p> <p>25 assuming you're talking about the dates of the 5th</p>	<p style="text-align: right;">Page 51</p> <p>1 state for the record that I, I did call Paulo</p> <p>2 before this deposition and let him know that if</p> <p>3 this witness was available for trial, we would not</p> <p>4 take the deposition, and he said she was</p> <p>5 unavailable and if that was not the case, he would</p> <p>6 check. In our view, that is not unavailable, and</p> <p>7 although we've taken this deposition, we will</p> <p>8 subpoena her for trial.</p> <p>9 I'm gonna take a break, ma'am. I'm</p> <p>10 gonna stop my little clock here, and give me ten</p> <p>11 minutes. Thanks.</p> <p>12 THE VIDEOGRAPHER: Going off the</p> <p>13 record at 10:51.</p> <p>14 (Recess).</p> <p>15 THE VIDEOGRAPHER: We are back on the</p> <p>16 record with Clip 2 at 11:05.</p> <p>17 Q. Ma'am, if you'll look at Exhibit 26.</p> <p>18 (Exhibit 26 marked).</p> <p>19 Q. We looked at this before, it's Exhibit</p> <p>20 twen -- Trial Exhibit 26. In this e-mail, where</p> <p>21 it says, As I told VdV, can you tell --</p> <p>22 MR. MCKEEBY: Are you pulling --</p> <p>23 Q. -- me who that is?</p> <p>24 MR. MCKEEBY: Are you pulling it up?</p> <p>25 MR. PRYOR: Oh, oh, I'm sorry. I've</p>
<p style="text-align: right;">Page 50</p> <p>1 through the 8th? I am --</p> <p>2 Q. No, I'm not, ma'am. No, ma'am, I'm</p> <p>3 talking about July 5th through July 12th.</p> <p>4 A. Okay. Okay.</p> <p>5 Q. Are you available for trial any of those</p> <p>6 days?</p> <p>7 A. I am not, and I'm happy to share why. I,</p> <p>8 I have very little opportunity to spend time with</p> <p>9 my family when they're in town, and the week after</p> <p>10 the Fourth they're coming in and they're spending</p> <p>11 time with me. And my niece and her husband have</p> <p>12 three children, and my nephew is undergoing -- at</p> <p>13 age 34 is undergoing cancer for melanoma, is</p> <p>14 undergoing treatment, and my husband and I have</p> <p>15 promised to baby-sit their children during that</p> <p>16 time because we are like grandparents to them.</p> <p>17 They, they have very little support.</p> <p>18 The following week, I am traveling</p> <p>19 because I have commitments to speak at a</p> <p>20 hospitality summit, and I also have a, a --</p> <p>21 produced a schedule of a town hall in one of the</p> <p>22 bases in Atlanta. And when we produce a town hall</p> <p>23 for our people, we don't cancel it because they</p> <p>24 bid their schedules around these.</p> <p>25 MR. PRYOR: All right. I'll just</p>	<p style="text-align: right;">Page 52</p> <p>1 gotta share screen.</p> <p>2 MR. MCKEEBY: Yeah, no worries.</p> <p>3 MR. PRYOR: Yes, I will, yes, I will</p> <p>4 pull it up. I thought I was. Let me share</p> <p>5 screen. Okay. Maybe that's it. I may have the</p> <p>6 wrong one up there, but I'll get the right one</p> <p>7 now.</p> <p>8 Q. Okay. We talked about this e-mail, it's</p> <p>9 Exhibit 26. In the middle of the first paragraph,</p> <p>10 it says, As I told VdV.</p> <p>11 Do you know who that is?</p> <p>12 MR. MCKEEBY: I, I still don't think</p> <p>13 you have the right -- Bobby, I don't think you</p> <p>14 have the right document pulled up. At least I</p> <p>15 don't have it on my screen.</p> <p>16 MR. PRYOR: What, what are you guys,</p> <p>17 what are you guys looking at?</p> <p>18 MR. MCKEEBY: I've got the --</p> <p>19 MR. PRYOR: You're looking at Exhibits</p> <p>20 --</p> <p>21 MR. MCKEEBY: -- the deposition</p> <p>22 notice.</p> <p>23 THE WITNESS: Same.</p> <p>24 MR. PRYOR: Huh. Mine says -- new</p> <p>25 share then. Let's try that. Yes, how about this.</p>

Page 53	Page 55
<p>1 There we go.</p> <p>2 MR. MCKEEBY: Still the same one.</p> <p>3 MR. PRYOR: Zoom share. Okay. I am</p> <p>4 clicking on it with all my might.</p> <p>5 MR. MCKEEBY: I believe it.</p> <p>6 MR. PRYOR: Did that help?</p> <p>7 MR. MCKEEBY: Yes.</p> <p>8 THE WITNESS: That's it.</p> <p>9 MR. MCKEEBY: Now we've got it.</p> <p>10 MR. PRYOR: The third time's the</p> <p>11 charm.</p> <p>12 Q. Ma'am, can you tell me who VdV is?</p> <p>13 A. Mike Van de Ven, our chief operating --</p> <p>14 Q. So he's --</p> <p>15 A. -- officer.</p> <p>16 Q. Let's look at Exhibit 21 again. And this</p> <p>17 is Exhibit 21, and the page number is marked</p> <p>18 Response App. 76. And this is an e-mail to you.</p> <p>19 Do you see that?</p> <p>20 A. Yes.</p> <p>21 Q. So Brian sends you an e-mail, and did he</p> <p>22 send -- did he send this to your business e-mail</p> <p>23 or your personal e-mail?</p> <p>24 A. I, I don't know. I can't tell.</p> <p>25 Q. But you don't, you don't deny that he sent</p>	<p>1 A. Correct.</p> <p>2 Q. By the way, Mike Sims was in the union as</p> <p>3 well, wasn't he?</p> <p>4 A. Many years ago, yes.</p> <p>5 Q. And he -- well, at the time of the</p> <p>6 problems in 2013, 2014, was he a union member?</p> <p>7 A. No, sir.</p> <p>8 Q. When was he last a union member?</p> <p>9 A. I don't, I don't really know.</p> <p>10 Q. And do you know if he was active in the</p> <p>11 union?</p> <p>12 A. He was.</p> <p>13 Q. And do you know if he was an officer?</p> <p>14 A. I believe he was the grievance chair, but</p> <p>15 I can't confirm that.</p> <p>16 Q. Do you recall seeing the termination</p> <p>17 letter for Charlene?</p> <p>18 A. I recently saw it in some documents</p> <p>19 provided to me by Mr. McKeeby, but I don't</p> <p>20 recall -- I hadn't recalled it before then.</p> <p>21 Q. What other documents did you review for</p> <p>22 your deposition other than the termination letter?</p> <p>23 A. I think there was -- the, the one that you</p> <p>24 pulled up earlier that was sent to Suzanne</p> <p>25 Stephensen.</p>
Page 54	Page 56
<p>1 you this e-mail?</p> <p>2 A. I don't remember it, but -- because he</p> <p>3 sent me so many.</p> <p>4 Q. You don't remember this at all, him trying</p> <p>5 to get Jeanna Jackson fired for the -- I don't</p> <p>6 know how many times?</p> <p>7 MR. MCKEEBY: Object to the --</p> <p>8 A. I don't --</p> <p>9 MR. MCKEEBY: Object to the</p> <p>10 characterization.</p> <p>11 You, you can answer his question if</p> <p>12 you remember the e-mail.</p> <p>13 A. I, I -- it's a long time ago, so I'm</p> <p>14 seeing it now again maybe. I don't remember, but</p> <p>15 I, I, I, I remember his -- you know, him talking a</p> <p>16 lot about her.</p> <p>17 Q. And your response to Brian was what?</p> <p>18 A. I don't recall.</p> <p>19 Q. You can see it on the screen. May 16,</p> <p>20 2017, the next day, you respond, Thank you, Brian,</p> <p>21 and I assume that means e -- e should be I -- I</p> <p>22 will review your concerns, or We will review your</p> <p>23 concerns, correct?</p> <p>24 A. That looks like that's from Mike Sims.</p> <p>25 Q. Oh, and Mike Sims reports to you?</p>	<p>1 Q. And what did that one say? Remind me.</p> <p>2 A. It wa -- the title was Complaint,</p> <p>3 Complaint, contains graphic images or something</p> <p>4 like that.</p> <p>5 Q. Is that the one with the long list of</p> <p>6 objectors that the -- he sent to management?</p> <p>7 A. I don't have --</p> <p>8 MR. MCKEEBY: No, that's, that's</p> <p>9 Stone's complaint.</p> <p>10 A. Yeah. So I, I don't have that one.</p> <p>11 Q. Oh, you sent Stone's complaint.</p> <p>12 MR. MCKEEBY: Yes.</p> <p>13 Q. What other documents? Is that it?</p> <p>14 A. I have the letter, oh, the Read Before</p> <p>15 Fly, and then this --</p> <p>16 Q. The what?</p> <p>17 A. The RBF, that you referenced earlier.</p> <p>18 Q. Okay.</p> <p>19 A. And then the, the e-mail that was sent</p> <p>20 from Suzanne -- excuse me, from Audrey to Suzanne,</p> <p>21 Naomi Hudson, and copied me.</p> <p>22 Q. Tell me about every conversation you had</p> <p>23 with Au -- have you read Ms. Stone's deposition,</p> <p>24 by the way?</p> <p>25 A. I have not.</p>

Page 57

1 Q. Tell me every conversation you've had with  
2 Ms. Stone about her complaint.  
3 MR. MCKEEBY: Her complaint about  
4 Ms. Carter?  
5 MR. PRYOR: Her complaint about  
6 Ms. Carter.  
7 A. I don't remember. That's so many years  
8 ago. I remember that she brought it forward, and  
9 I passed it on my team, which is, again, what I  
10 normally would do.  
11 So I don't recall any specifics. I  
12 remember her being highly emotional about it, and  
13 I sent her to my team.  
14 Q. So it's -- since you knew she was highly  
15 emotional about it, that means you must have  
16 spoken to her?  
17 A. I remem --  
18 Q. Was she emotional during that  
19 conversation?  
20 A. I -- when I say emotional, I mean that  
21 she -- I could tell that she was upset, so I sent  
22 her to my team.  
23 Q. Wait. You could tell she was upset from  
24 what she wrote?  
25 A. I'm talking about when -- she -- because

Page 58

1 of the nature of union business and her frequency  
2 in and out of this office for negotiations, I  
3 would see her in passing, and if she tried to talk  
4 to me about anything like that, and I do recall  
5 her saying something one day about how upset she  
6 was about this, and I said, You need to deal with  
7 my team; i.e., Mike Sims.  
8 Q. And, by the way, is Ms. Emlet on your  
9 team?  
10 A. She was not.  
11 Q. Does your team include employee relations?  
12 A. No, sir.  
13 Q. Then why would your team be dealing with  
14 her complaint?  
15 A. Because they would engage employee  
16 relations. It starts here with our team if  
17 somebody brings something forward, and our team --  
18 Q. Why, why wouldn't you -- why wouldn't you  
19 just direct her to employee relations? Do you  
20 need someone on your team to tell her to go to  
21 employee relations?  
22 A. I just -- that's how --  
23 MR. MCKEEBY: Objection to the form.  
24 It's compound.  
25 You can answer.

Page 59

1 A. I -- that's just our process.  
2 MR. MCKEEBY: Bobby, you're about out  
3 of your --  
4 Q. With others --  
5 MR. MCKEEBY: Hold on, hold on.  
6 You're about at your time limit, so --  
7 MR. PRYOR: Yeah, I, I have it, I have  
8 it, I have it at a little less than one hour if  
9 you take out all the objections. If -- we're  
10 gonna ask that she be at trial. We'll ask for  
11 more time for her deposition. If we don't get  
12 that, but I, I will -- I understand my limitation.  
13 I have a lot more questions, but I will wrap up in  
14 two or three minutes here.  
15 Q. Ma'am, should Southwest Airlines engage in  
16 trying to limit anyone's ability to object to  
17 union -- to their union?  
18 MR. MCKEEBY: Object to form.  
19 You can answer.  
20 A. Should Southwest Airlines -- please repeat  
21 it one more time.  
22 Q. Should Southwest Airlines be involved in  
23 disciplining an employee for engaging in union  
24 activities?  
25 A. I believe it probably depends on the

Page 60

1 scenario. That's probably the -- how I would  
2 answer that.  
3 Q. If a jury decides that Southwest has  
4 improperly interfered with Ms. Carter's union  
5 activities, do you have an opinion as to how much  
6 money the jury should award so that you will  
7 remember these things, so that Southwest's board  
8 will remember these things and stop doing it?  
9 MR. MCKEEBY: Object to the form of  
10 the question. It mischaracterizes testimony. It  
11 assumes facts not in evidence.  
12 You can answer.  
13 A. I don't, I don't have an opinion on that.  
14 Q. You don't have an opinion?  
15 A. You, you asked me if I had an opinion on  
16 how much they would pay, and I don't, I don't have  
17 an opinion.  
18 Q. No, no, I didn't say how much they would  
19 pay. I said how much a jury should award so that  
20 Southwest will quit doing these kinds of things to  
21 an employee like Charlene and other union  
22 objectors.  
23 MR. MCKEEBY: Same objection.  
24 Q. If you don't think they should be -- if a  
25 jury finds that, you don't think you should be

Page 61

1 punished?  
2 MR. MCKEEBY: Same objection.  
3 A. I believe --  
4 MR. MCKEEBY: Counsel, you need to  
5 wrap up.  
6 Q. I am. I -- you -- what was your answer  
7 and then I'll conclude. What was your answer?  
8 A. I believe in the process, and I -- that's,  
9 that's my answer. I trust the process.  
10 MR. PRYOR: All right. I've already  
11 stated on the record our position on this. And I  
12 do think I'm at the one-hour mark, and maybe  
13 slightly over, but if you count all the colloquy,  
14 and there frankly wasn't that much, I think I'm  
15 right at it. I appreciate your patience, Counsel,  
16 because we had a lot to cover in a short period of  
17 time. I pass the witness.  
18 MR. MCKEEBY: No questions at this  
19 time. Thank you, Ms. Lacore.  
20 THE VIDEOGRAPHER: Going off the  
21 record at 11:17.  
22 THE REPORTER: What about signature?  
23 MR. PRYOR: Hang on. What about, what  
24 about Ed?  
25 MR. GREENFIELD: You need to ask the

Page 62

1 union, to get us on the record, please.  
2 MR. MCKEEBY: Fine. Sorry, Ed.  
3 MR. CLOUTMAN: We have no questions.  
4 THE VIDEOGRAPHER: Going off the  
5 record at 11:17.  
6 THE REPORTER: Signature?  
7 MR. PRYOR: Thank you.  
8 MR. MCKEEBY: Yeah, we'll read and  
9 sign, if you'll send it to me, as the one -- same  
10 as the one yesterday. Same, same copy request as  
11 well.  
12 MR. CLOUTMAN: As with us.  
13 THE REPORTER: Anyone else?  
14 MR. CLOUTMAN: Yes, the union wants a  
15 condensed copy only.  
16 THE REPORTER: Mr. Greenfield?  
17 MR. GREENFIELD: Yes.  
18 (Deposition concluded at 11:17 a.m.)  
19  
20  
21  
22  
23  
24  
25

Page 63

1 CHANGES AND SIGNATURE  
2 WITNESS NAME: SONYA LACORE DATE: JUNE 24, 2022  
3 PAGELINE CHANGE REASON  
4 \_\_\_\_\_  
5 \_\_\_\_\_  
6 \_\_\_\_\_  
7 \_\_\_\_\_  
8 \_\_\_\_\_  
9 \_\_\_\_\_  
10 \_\_\_\_\_  
11 \_\_\_\_\_  
12 \_\_\_\_\_  
13 \_\_\_\_\_  
14 \_\_\_\_\_  
15 \_\_\_\_\_  
16 \_\_\_\_\_  
17 \_\_\_\_\_  
18 \_\_\_\_\_  
19 \_\_\_\_\_  
20 \_\_\_\_\_  
21 \_\_\_\_\_  
22 \_\_\_\_\_  
23 \_\_\_\_\_  
24 \_\_\_\_\_  
25 \_\_\_\_\_

Page 64

1 \_\_\_\_\_  
2 \_\_\_\_\_  
3 I, SONYA LACORE, have read the foregoing  
4 deposition and hereby affix my signature that same  
5 is true and correct, except as noted above.  
6  
7  
8  
9  
10 \_\_\_\_\_  
11 SONYA LACORE  
12 THE STATE OF \_\_\_\_\_)  
13 COUNTY OF \_\_\_\_\_)  
14  
15 Before me, \_\_\_\_\_, on  
16 this day personally appeared SONYA LACORE, known  
17 to me (or proved to me under oath or through  
18 \_\_\_\_\_) (description of  
19 identity card or other document)) to be the person  
20 whose name is subscribed to the foregoing  
21 instrument and acknowledged to me that they  
22 executed the same for the purposes and  
23 consideration therein expressed.  
24 Given under my hand and seal of office  
25 this \_\_\_\_\_ day of \_\_\_\_\_,

<p style="text-align: right;">Page 65</p> <p>1 _____.</p> <p>2</p> <p>3</p> <p>4</p> <p>5 NOTARY PUBLIC IN AND FOR THE STATE OF _____ COMMISSION EXPIRES: _____</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 67</p> <p>1 That the amount of time used by each party at</p> <p>2 the deposition is as follows:</p> <p>3 BOBBY G. PRYOR.....01 HOUR(S):06 MINUTE(S)</p> <p>4 That pursuant to information given to the</p> <p>5 deposition officer at the time said testimony was</p> <p>6 taken, the following includes counsel for all</p> <p>7 parties of record:</p> <p>8 FOR THE PLAINTIFF:</p> <p>9 MATTHEW D. HILL</p> <p>10 Pryor &amp; Bruce</p> <p>11 302 North San Jacinto</p> <p>12 Rockwall, Texas 75087</p> <p>13 972.771.3933</p> <p>14 Mhill@pryorandbruce.com</p> <p>15</p> <p>16 MATTHEW B. GILLIAM</p> <p>17 National Right to Work Legal Defense</p> <p>18 Foundation, Inc.</p> <p>19 8001 Braddock Road</p> <p>20 Suite 600</p> <p>21 Springfield, Virginia 22160</p> <p>22 703.321.8510</p> <p>23 Mbg@nrtw.org</p> <p>24</p> <p>25 FOR THE DEFENDANT SOUTHWEST AIRLINES CO.:</p> <p>PAULO B. MCKEEBY</p> <p>Reed Smith</p> <p>2850 North Harwood Street</p> <p>Suite 1500</p> <p>Dallas, Texas 75201</p> <p>Pmckeeby@reedsmith.com</p>
<p style="text-align: right;">Page 66</p> <p>1 IN THE UNITED STATES DISTRICT COURT</p> <p>2 FOR THE NORTHERN DISTRICT OF TEXAS</p> <p>3 DALLAS DIVISION</p> <p>4 CHARLENE CARTER, )</p> <p>5 Plaintiff, )</p> <p>6 VS. ) CIVIL ACTION</p> <p>7 ) NO.: 3:17-cv-02278-X</p> <p>8 SOUTHWEST AIRLINES CO., )</p> <p>9 AND TRANSPORT WORKERS )</p> <p>10 UNION OF AMERICA, LOCAL )</p> <p>11 556, )</p> <p>12 Defendants. )</p> <p>13</p> <p>14 REPORTER'S CERTIFICATION</p> <p>15 DEPOSITION OF SONYA LACORE</p> <p>16 JUNE 24, 2022</p> <p>17</p> <p>18 I, Melody A. Monk, Certified Shorthand</p> <p>19 Reporter in and for the State of Texas, hereby</p> <p>20 certify to the following:</p> <p>21 That the witness, SONYA LACORE, was duly sworn</p> <p>22 by the officer and that the transcript of the oral</p> <p>23 deposition is a true record of the testimony given</p> <p>24 by the witness;</p> <p>25 That the deposition transcript was submitted</p> <p>on June 29, 2022 to the witness or to the attorney</p> <p>for the witness for examination, signature and</p> <p>return to me by July 28, 2022;</p>	<p style="text-align: right;">Page 68</p> <p>1 FOR THE DEFENDANT TRANSPORT WORKERS UNION OF</p> <p>2 AMERICA LOCAL 556:</p> <p>3 EDWARD B. CLOUTMAN, III</p> <p>4 Law Offices of Edward Cloutman III</p> <p>5 3301 Elm Street</p> <p>6 Dallas, Texas 75226</p> <p>7 214.232.9015</p> <p>8 Ecloutman@lawoffices.email</p> <p>9</p> <p>10 ADAM S. GREENFIELD</p> <p>11 Cloutman &amp; Greenfield, PLLC</p> <p>12 3301 Elm Street</p> <p>13 Dallas, Texas 75226</p> <p>14 Agreenfield@candlegal.com</p> <p>15</p> <p>16 That \$_____ is the deposition officer's</p> <p>17 charges to the Plaintiff for preparing the</p> <p>18 original deposition transcript and any copies of</p> <p>19 exhibits;</p> <p>20 I further certify that I am neither counsel</p> <p>21 for, related to, nor employed by any of the</p> <p>22 parties or attorneys in the action in which this</p> <p>23 proceeding was taken, and further that I am not</p> <p>24 financially or otherwise interested in the outcome</p> <p>25 of the action.</p> <p>Certified to by me this 27th day of June,</p> <p>2022.</p> <p>_____</p> <p>Melody A. Monk, RPR</p> <p>Texas CSR No. 3613</p> <p>Expiration Date: 10/21/2022</p>

17 (Pages 65 to 68)

Page 69

1 MELODY MONK REPORTING  
Firm Registration No. 10821  
2 1999 McKinney Avenue, No. 1404  
Dallas, Texas 75201  
3 888.988.5317 (phone and fax)  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

18 (Page 69)

MELODY MONK REPORTING  
888.988.5317

<b>A</b>	37:15 59:15,20 59:22 66:6 67:19 Airlines' 9:7 al 41:2 allow 18:5 ambiguous 36:6 America 1:7 3:19 6:5 66:7 68:1 amount 67:1 Android 5:12 answer 9:3,15 9:19 10:24 16:10 18:25 19:1,19 23:16 24:25 30:10,13 32:5 33:23 34:7 35:1 37:23 38:10,21 39:6,18 41:6 42:17 43:20 44:25 46:1,15 54:11 58:25 59:19 60:2,12 61:6,7,9 answered 29:16 41:13 answering 19:4 19:20 anymore 13:25 33:4 anyone's 59:16 App 5:12 53:18 Apparently 29:11 appearances 5:2 6:9 appeared 64:16 appearing 3:2 apply 16:2 20:19 appreciate 61:15 appropriate 21:20 41:20	arena 37:2 argumentative 23:15 29:25 Armstrong 4:8 asked 16:20 17:13 30:9 35:3 60:15 asking 6:20 19:23 24:9 27:10 30:8,11 34:1,15 46:23 49:13 aspect 48:4,5,6 48:10,11 assassination 42:13 46:10 assassinations 27:17,21 28:4 29:5 38:18 44:17 assist 15:2,10 16:1 17:9,14 17:22 25:4 assistance 18:10 19:11 assisting 16:15 assists 10:12 Associate 4:7 assume 16:19 17:24 27:8,15 54:21 assumes 60:11 assuming 16:17 49:25 Atlanta 50:22 attached 2:3 42:7 attendant 9:25 11:2 13:14,20 15:25 25:19,24 27:1 attendants 12:24 19:8 35:20 36:10,11 37:3	attitude 27:3 attorney 4:6 7:4 8:4,10 66:23 attorneys 9:8 68:16 Au 56:23 Audrey 11:10 12:5 35:18 37:5 38:14 39:11 40:18,22 56:20 authored 40:10 automatically 10:19 available 50:5 51:3 Avenue 69:2 award 60:6,19 aware 11:5 14:2 14:20 17:4 44:20	<b>B</b> B 3:8,14,20 67:13,20 68:2 baby-sit 50:15 back 15:19 25:21 39:21 51:15 bargaining 24:4 base 20:16 37:17 46:25 bases 50:22 began 33:1 beginning 36:18 behalf 13:25 believe 12:16 39:14 45:6 53:5 55:14 59:25 61:3,8 Berlanger 43:8 best 36:21 46:1 Beverly 43:8 bid 50:24 bit 7:24 25:9	33:2 Block 4:5 board 13:3,6,7 13:23 29:19 60:7 Bobby 3:4 6:13 7:13 52:13 59:2 67:3 Bpryor@pryo... 3:7 Braddock 3:10 67:14 break 51:9 Brian 25:17,19 26:6 27:12 28:9 32:16,23 32:24 38:17 42:7,13 43:6 44:16 46:5 48:18,25 53:21 54:17,20 bring 14:4 brings 58:17 brought 11:17 57:8 Bruce 3:5 67:9 business 12:13 26:14 45:11 53:22 58:1
			<b>C</b> C 3:1 call 51:1 cancel 50:23 cancer 50:13 candidates 11:6 11:11,12,14 caps 33:14 card 64:19 Carter 1:3 4:6 6:3,14 7:14 37:6 43:9 57:4 57:6 66:3 Carter's 60:4 case 6:3,5 18:3		

48:14 49:17 51:5 <b>casual</b> 33:10 <b>cause</b> 1:21 14:1 <b>Central</b> 39:24 <b>certainly</b> 25:20 28:12 <b>Certificate</b> 5:7 <b>CERTIFICA...</b> 66:11 <b>Certified</b> 66:15 68:20 <b>certify</b> 66:17 68:14 <b>chair</b> 13:20 55:14 <b>challenge</b> 49:11 <b>challenges</b> 28:10 36:20 <b>chance</b> 45:18 <b>CHANGE</b> 63:3 <b>changed</b> 49:22 <b>CHANGES</b> 63:1 <b>characterizati...</b> 39:5 42:16 43:19 54:10 <b>charges</b> 68:11 <b>Charlene</b> 1:3 4:6 6:3,14 7:14 37:6 43:8 47:23 55:17 60:21 66:3 <b>charm</b> 53:11 <b>check</b> 51:6 <b>chief</b> 53:13 <b>children</b> 50:12 50:15 <b>Chris</b> 4:6 <b>CISM</b> 13:10,20 22:11 <b>city</b> 29:18 <b>Civil</b> 1:5 2:1 6:5 66:5 <b>clicking</b> 53:4 <b>Clip</b> 51:16	<b>clock</b> 51:10 <b>Cloutman</b> 3:20 3:21 4:1 6:25 6:25 62:3,12 62:14 68:2,3,7 <b>coincidence</b> 40:6 42:4,10 <b>collective</b> 24:4 <b>college</b> 49:15,15 <b>colloquy</b> 61:13 <b>come</b> 18:5 45:19 48:13 <b>comes</b> 16:14 23:8 <b>coming</b> 29:19 50:10 <b>comment</b> 28:20 <b>comments</b> 31:7 <b>COMMISSION</b> 65:5 <b>commitments</b> 49:18,21,23 50:19 <b>committee</b> 13:5 21:6,7,8 39:12 <b>committees</b> 10:12 20:24 21:4,23 22:8 23:1 24:6 25:5 <b>committing</b> 9:11 <b>company</b> 6:4 9:11 14:16 16:4 22:8 24:6 47:12 <b>competing</b> 11:6 <b>complaining</b> 36:10 <b>complaint</b> 37:5 37:16 38:3 39:16 40:2,18 40:23 56:2,3,9 56:11 57:2,3,5 58:14 <b>complaints</b> 11:17 36:9	<b>completely</b> 9:4 <b>comply</b> 21:17,21 <b>compound</b> 19:17,18 29:25 32:4 58:24 <b>concerns</b> 54:22 54:23 <b>conclude</b> 61:7 <b>concluded</b> 62:18 <b>condensed</b> 62:15 <b>confirm</b> 55:15 <b>consider</b> 11:4 <b>consideration</b> 64:23 <b>containing</b> 42:8 <b>contains</b> 56:3 <b>content</b> 45:9 <b>Contract</b> 5:12 <b>contracts</b> 39:16 <b>conversation</b> 56:22 57:1,19 <b>conversations</b> 33:11 <b>copied</b> 37:7,13 38:22 43:24 56:21 <b>copies</b> 68:12 <b>copy</b> 62:10,15 <b>Corliss</b> 26:22,25 27:1 <b>correct</b> 8:17 15:11 17:25 23:21 24:18,21 25:1,15,16,21 26:15 38:5,11 42:19 43:16 54:23 55:1 64:5 <b>correctly</b> 15:3,5 <b>corresponded</b> 38:17 <b>counsel</b> 4:7 6:9 7:17,19,21,21 18:16 20:6 30:10 34:14	61:4,15 67:6 68:14 <b>count</b> 61:13 <b>COUNTY</b> 64:13 <b>couple</b> 26:22 <b>course</b> 12:13 <b>court</b> 1:1 6:7,11 66:1 <b>cover</b> 61:16 <b>coworker</b> 38:3 <b>crowd</b> 29:18 31:4 <b>CSR</b> 1:23 68:24 <b>currently</b> 27:2 <hr/> <b>D</b> <hr/> <b>D</b> 67:9 <b>Dallas</b> 1:2,25 3:16,22 4:2 6:7 6:24 7:2,5 66:2 67:22 68:4,8 69:2 <b>dangerous</b> 26:24 27:7,7 <b>Date</b> 63:2 68:25 <b>dates</b> 49:25 <b>day</b> 14:14 39:21 39:25 40:18 54:20 58:5 64:16,25 68:20 <b>days</b> 26:10 50:6 <b>de</b> 53:13 <b>deadlines</b> 18:6 <b>deal</b> 15:1 58:6 <b>dealing</b> 40:7 58:13 <b>Deborah</b> 42:6 <b>decides</b> 60:3 <b>DEFENDANT</b> 3:13,19 67:19 68:1 <b>Defendants</b> 1:8 66:9 <b>Defense</b> 3:9 67:13	<b>define</b> 10:17,24 <b>definitely</b> 14:19 <b>degree</b> 49:16 <b>delegate</b> 25:9 <b>deliver</b> 33:15 <b>deny</b> 53:25 <b>department</b> 12:18,21 <b>depended</b> 45:1 <b>depends</b> 37:25 38:24 48:15 59:25 <b>deposition</b> 1:12 1:18 6:2 8:5 11:25 41:21 51:2,4,7 52:21 55:22 56:23 59:11 62:18 64:4 66:12,20 66:22 67:2,5 68:10,12 <b>describe</b> 11:1 <b>description</b> 5:9 64:18 <b>desk</b> 16:15 23:9 <b>details</b> 45:2 <b>determine</b> 42:9 47:19 <b>different</b> 26:13 <b>difficult</b> 34:24 49:10,20 <b>dig</b> 47:13 <b>direct</b> 58:19 <b>directed</b> 46:4 <b>director</b> 10:15 12:17 <b>directors</b> 20:15 20:16 21:15 22:19 <b>disagreeing</b> 15:18,20 20:2 <b>disciplining</b> 59:23 <b>discuss</b> 33:13 36:13
---	---	--	---	---

<p><b>discussed</b> 43:6  <b>discussions</b>  36:16  <b>disenfranchised</b>  23:11  <b>disqualified</b>  11:14  <b>District</b> 1:1,1  6:6,7 66:1,1  <b>Division</b> 1:2 6:8  66:2  <b>document</b> 11:21  11:25 12:12  26:10 52:14  64:19  <b>documents</b>  16:20,21 17:6  18:7,8 28:19  55:18,21 56:13  <b>doing</b> 16:13  17:23 19:2,3  30:16 31:23  33:20 60:8,20  <b>drama</b> 14:5,7  <b>dreadful</b> 29:6  <b>dues</b> 11:3 13:3  13:23  <b>duly</b> 1:20 7:7  66:18</p> <hr/> <p><b>E</b></p> <p><b>e</b> 3:1,1 54:21,21  <b>e-mail</b> 12:4  14:11,16 20:14  21:25 22:17  26:4,13 27:18  28:17 29:13,16  31:20,25 33:7  33:17 34:2,4  35:6 37:7 43:4  43:7,24 45:24  46:3,6,10 47:3  47:14,16 51:20  52:8 53:18,21  53:22,23 54:1</p>	<p>54:12 56:19  <b>e-mailed</b> 42:14  <b>e-mails</b> 17:25  26:6 32:24  33:1 38:4 42:7  44:1,8,11  48:17,18,23,24  <b>earlier</b> 40:13  55:24 56:17  <b>early</b> 11:5,20  <b>Ecloutman@l...</b>  3:23 68:5  <b>Ed</b> 6:25 61:24  62:2  <b>educate</b> 40:14  <b>education</b> 49:2,3  49:14,14  <b>Edward</b> 3:20,21  68:2,3  <b>Edwards</b> 42:6  <b>eight</b> 23:24  <b>Eileen</b> 13:15,16  13:19,24  <b>election</b> 29:21  32:19  <b>Elm</b> 3:21 4:2  68:3,7  <b>Email</b> 5:10,10  5:11,12,13,14  5:14,15  <b>Emlet</b> 42:6  46:21,22 58:8  <b>emotional</b> 57:12  57:15,18,20  <b>employed</b> 68:15  <b>employee</b> 9:10  9:11,21 10:25  37:16 45:7  58:11,15,19,21  59:23 60:21  <b>employees</b> 10:20  <b>encourage</b> 9:21  31:14  <b>encourages</b>  36:11</p>	<p><b>ended</b> 11:13  <b>engage</b> 58:15  59:15  <b>engaging</b> 37:3  59:23  <b>especially</b> 22:4  36:16  <b>evasion</b> 9:4  <b>evidence</b> 60:11  <b>exactly</b> 16:22  34:25  <b>examination</b> 5:5  7:9 66:24  <b>excuse</b> 35:23  56:20  <b>executed</b> 64:22  <b>Exhib</b> 33:7  <b>exhibit</b> 11:22,23  11:24 25:11  33:8 35:12,12  35:14,18 36:23  37:5,8 39:19  39:20,22 42:1  42:22,24 43:1  51:17,18,19,20  52:9 53:16,17  <b>exhibits</b> 5:8  52:19 68:13  <b>experience</b>  12:17  <b>experts</b> 25:8  46:16  <b>Expiration</b>  68:25  <b>EXPIRES</b> 65:5  <b>explain</b> 10:10  <b>explanation</b>  45:19  <b>explore</b> 16:16  <b>expressed</b> 64:23</p> <hr/> <p><b>F</b></p> <p><b>Facebook</b> 43:12  46:7  <b>fact</b> 19:13 22:25</p>	<p><b>facts</b> 60:11  <b>failure</b> 18:7  <b>Fair</b> 19:1  <b>family</b> 50:9  <b>far</b> 28:1  <b>FAS</b> 33:15  <b>favoring</b> 19:9  <b>fax</b> 69:3  <b>February</b> 5:12  5:13,13,14,15  37:9 39:25  41:25 42:3,5  <b>Federal</b> 2:1  <b>feel</b> 34:25  <b>felt</b> 40:13  <b>fifteen</b> 24:24  <b>file</b> 23:1,12  <b>files</b> 18:6 37:25  <b>final</b> 26:17  31:24 32:10  <b>financially</b>  68:18  <b>find</b> 35:16 42:1  47:5  <b>finds</b> 60:25  <b>Fine</b> 62:2  <b>finish</b> 18:15  <b>fire</b> 29:8  <b>fired</b> 54:5  <b>firm</b> 40:15 69:1  <b>first</b> 7:7 9:23  11:22 26:12  30:2,5 34:15  34:19,21 45:3  49:24 52:9  <b>flight</b> 9:25 11:2  12:23 13:14,19  15:25 19:8  25:19,24 27:1  35:19 36:10,10  37:2  <b>Fly</b> 5:13 40:1,2  56:15  <b>Foley</b> 43:8  <b>follow</b> 14:2</p>	<p><b>following</b> 6:11  50:18 66:17  67:6  <b>follows</b> 7:8 67:2  <b>Forbes</b> 4:7  <b>foregoing</b> 64:3  64:20  <b>forgive</b> 18:7  <b>forgot</b> 6:20  <b>form</b> 9:13 15:15  16:8,23 18:1  18:13,18 19:18  21:4 23:15,25  28:6 29:2,24  32:3 34:5  37:21 38:19  39:3 42:15  44:23 45:16  46:13 58:23  59:18 60:9  <b>forward</b> 19:6  28:18 57:8  58:17  <b>forwarded</b>  22:18  <b>found</b> 33:8  45:10  <b>Foundation</b> 3:9  67:14  <b>Fourth</b> 50:10  <b>frankly</b> 61:14  <b>free</b> 9:19  <b>frequency</b> 58:1  <b>frequent</b> 27:12  <b>frequently</b> 37:3  <b>front</b> 30:17 35:3  <b>fully</b> 31:22  <b>further</b> 14:4  47:13 68:14,17  <b>FYI</b> 46:19</p> <hr/> <p><b>G</b></p> <p><b>G</b> 3:4 67:3  <b>General</b> 4:7  <b>Gilliam</b> 3:8 6:14</p>
--	---	--	--	---

67:13 <b>give</b> 30:23 34:12 51:10 <b>given</b> 64:24 66:20 67:4 <b>giving</b> 45:18,18 <b>go</b> 10:23 18:17 20:12 27:25 30:1 35:12,12 39:21 42:2,22 43:9 53:1 58:20 <b>goes</b> 10:11 26:21 29:17 <b>going</b> 6:1 14:2 16:1 24:1 26:21 35:16 48:14 51:12 61:20 62:4 <b>gonna</b> 7:23 12:4 12:8 16:11,21 26:8 30:13 51:9,10 59:10 <b>good</b> 46:18 <b>gotta</b> 52:1 <b>grandparents</b> 50:16 <b>graphic</b> 56:3 <b>Greenfield</b> 4:1,1 7:3,4 23:25 28:6 29:1,4 39:4 61:25 62:16,17 68:6 68:7 <b>Greg</b> 43:9 47:6 <b>Greg's</b> 47:5 <b>grievance</b> 55:14 <b>group</b> 11:11,12 12:23 36:19 38:24 40:14 <b>guess</b> 11:1 26:1 <b>guys</b> 44:19 52:16,17	<b>ha</b> 23:17 <b>hall</b> 50:21,22 <b>hand</b> 13:10,11 15:23,25 16:2 16:12,13 17:10 17:11 33:9 64:24 <b>handle</b> 36:21 <b>Hang</b> 61:23 <b>happened</b> 22:22 23:8 <b>happening</b> 11:8 <b>happenstance</b> 40:17,20 <b>happy</b> 14:3 35:1 47:9 49:24 50:7 <b>hard</b> 7:25 8:24 <b>Harwood</b> 3:15 67:21 <b>head</b> 10:19 40:8 <b>heads-up</b> 12:25 14:19 <b>hear</b> 35:8,10 48:3 49:5,7,8 <b>hearing</b> 8:1,24 49:11 <b>hearings</b> 48:8 <b>heavy</b> 29:18 <b>held</b> 22:8 <b>help</b> 27:19 32:18 45:13 53:6 <b>helping</b> 10:14 <b>hereto</b> 2:3 <b>hey</b> 14:18 44:19 <b>high</b> 49:14 <b>highly</b> 31:14 57:12,14 <b>HILL</b> 67:9 <b>hired</b> 9:24 <b>history</b> 29:7 <b>Hmm</b> 12:16 <b>Hofer</b> 43:9 <b>hold</b> 59:5,5 <b>home</b> 7:5	<b>honest</b> 22:15 <b>honestly</b> 14:8 22:13 23:7 33:1 46:18 <b>hospitality</b> 50:20 <b>hour</b> 59:8 <b>HOUS(S):06</b> 67:3 <b>HR</b> 45:11 <b>Hudson</b> 39:2,2,7 56:21 <b>huge</b> 29:20 <b>Huh</b> 52:24 <b>hundreds</b> 23:11 23:17 <b>husband</b> 50:11 50:14 <b>hypothetical</b> 44:24 46:14	27:7 <b>INDEX</b> 5:1 <b>indicate</b> 48:11 <b>indication</b> 19:25 <b>inflight</b> 12:18,20 12:22,23 19:7 22:18 24:17 37:18 <b>information</b> 42:9 43:5 44:8 44:15 47:22 67:4 <b>inner</b> 29:18 <b>installment</b> 26:18 31:24 32:10 <b>installments</b> 32:1,11 <b>instance</b> 1:20 <b>instated</b> 11:13 <b>instruct</b> 41:6 <b>instructed</b> 13:15 13:24 <b>instructing</b> 41:20 <b>instrument</b> 64:21 <b>intent</b> 15:22 <b>intentionally</b> 48:15 <b>interact</b> 33:3 <b>interacting</b> 33:5 <b>interested</b> 68:18 <b>interesting</b> 47:11 <b>interfered</b> 60:4 <b>interpret</b> 32:16 32:19 <b>interpreted</b> 20:13 <b>investigate</b> 28:13 <b>investigates</b> 28:11 <b>inviting</b> 16:25	16:25 <b>involve</b> 48:15 <b>involved</b> 47:21 47:24 48:7,10 48:11,12 59:22 <b>involvement</b> 47:25 48:6 <b>involving</b> 47:23 <b>issue</b> 17:4 26:20 <b>issues</b> 40:7
<b>J</b>				
<b>Jacinto</b> 3:5 67:10 <b>Jackson</b> 43:7 54:5 <b>January</b> 5:10 12:5 14:14,22 15:19 <b>Jeanna</b> 43:7 54:5 <b>joint</b> 22:8,10 24:6 <b>jointly</b> 22:10,11 <b>Julie</b> 42:5 45:5,6 46:2 <b>July</b> 50:3,3 66:25 <b>June</b> 1:14,22 6:2 63:2 66:13,23 68:20 <b>jury</b> 8:21,25 12:22 17:4 19:13 22:1 32:14 43:10 60:3,6,19,25				
<b>K</b>				
<b>keep</b> 36:12 47:9 <b>Ken</b> 17:10 <b>Kent</b> 13:10,11 15:23,25 16:2 16:11,13 17:10 17:11 <b>Kerrie</b> 4:7				

<b>kick</b> 21:23 24:5 <b>kicked</b> 20:24 23:1 <b>kicking</b> 25:5 <b>kind</b> 19:6 23:20 23:23 36:17 37:2 <b>kinds</b> 60:20 <b>knew</b> 25:20 57:14 <b>know</b> 8:14,14 9:9 10:11 11:14 13:11,16 13:25 14:6,22 15:1,10,21,21 17:15,19 18:2 19:20 20:17,22 22:7,12,12,22 22:25 23:3 24:3,8,11,13 24:25 25:4,7 25:12,23 27:6 27:8 28:11 32:2 39:18 40:15,20 41:7 42:19 43:16,22 44:3,11,11 46:2,9 47:6,7 47:14 48:13 51:2 52:11 53:24 54:6,15 55:9,10,13 <b>knowing</b> 44:16 46:9 <b>known</b> 25:25 26:1 64:16 <b>knows</b> 23:6 <hr/> <p style="text-align: center;"><b>L</b></p> <hr/> <b>labor</b> 39:8,9 45:10,13 46:4 46:11 47:2 <b>Lacore</b> 1:13,19 5:4 6:3 7:6,12 7:13 14:15	61:19 63:2 64:3,10,16 66:12,18 <b>large</b> 38:24 <b>Lauren</b> 4:8 <b>Law</b> 3:21 68:3 <b>lawsuit</b> 7:22 8:8 23:1,12 48:19 48:24 <b>lawyers</b> 7:1 <b>leader</b> 26:2 <b>leadership</b> 43:15 <b>leads</b> 12:23 13:19 <b>learned</b> 14:19 <b>leave</b> 20:15,16 <b>Legal</b> 3:9 67:13 <b>let's</b> 20:12,13 25:11 27:11 32:16 34:23 35:5,12 39:19 39:21 41:18,25 42:21,22 43:4 52:25 53:16 <b>letter</b> 55:17,22 56:14 <b>limit</b> 59:6,16 <b>limitation</b> 59:12 <b>limited</b> 30:15 35:4 <b>lines</b> 26:22 <b>Lisa</b> 4:5 <b>list</b> 56:5 <b>listen</b> 27:4 <b>little</b> 7:24 33:2 50:8,17 51:10 59:8 <b>Local</b> 1:7 3:19 6:5 7:2,5 10:5 11:7 20:18 66:7 68:1 <b>located</b> 1:25 <b>locations</b> 6:10 <b>long</b> 14:9 16:18 20:21 25:25,25	33:6 54:13 56:5 <b>longer</b> 39:7 <b>look</b> 14:13 25:11 28:18 39:19 41:18,25 43:3 43:3,7 51:17 53:16 <b>looked</b> 51:19 <b>looking</b> 19:5 47:9 52:17,19 <b>looks</b> 54:24 <b>lost</b> 11:12 <b>lot</b> 22:13 26:6 28:17 54:16 59:13 61:16 <b>lying</b> 33:19 34:1 <hr/> <p style="text-align: center;"><b>M</b></p> <hr/> <b>ma'am</b> 18:4,17 30:14 50:2,2 51:9,17 53:12 59:15 <b>Maberry</b> 4:6 <b>machine</b> 1:24 <b>maddening</b> 26:19 <b>major</b> 28:1 <b>making</b> 18:14 18:19,21,23 <b>management</b> 15:7 29:10 33:14 43:12 45:22 56:6 <b>manager</b> 37:17 46:25 47:2 <b>managers</b> 20:16 <b>mark</b> 61:12 <b>marked</b> 11:23 35:14 37:8 39:20 51:18 53:17 <b>Matt</b> 6:14 <b>matter</b> 7:14 9:8 45:11	<b>MATTHEW</b> 3:8 67:9,13 <b>Maureen</b> 42:5 46:21,22 <b>Mbg@nrtw.org</b> 3:11 67:16 <b>McKeeby</b> 3:14 6:15,16,19,22 6:23 7:20 9:13 9:18 15:13,15 16:8,23 17:2 18:1,11,13,18 18:20,23 19:15 19:17 20:3,5 21:1,3,8,13,22 23:4,14 25:2 27:23 28:22,24 29:24 30:3,9 30:12,18,22 32:3,9 33:21 34:5,14,18 35:17 37:21 38:6,8,19 39:3 39:6 41:3,8,11 41:12,17,22 42:12,15,23 43:2,18 44:4 44:21,23 45:16 45:21,23 46:13 49:7 51:22,24 52:2,12,18,21 53:2,5,7,9 54:7 54:9 55:19 56:8,12 57:3 58:23 59:2,5 59:18 60:9,23 61:2,4,18 62:2 62:8 67:20 <b>McKinney</b> 69:2 <b>mean</b> 10:10 16:15 43:9 48:10 57:20 <b>means</b> 54:21 57:15 <b>meant</b> 27:9,15	<b>media</b> 5:11 27:21,24 28:1 28:3,10 31:13 32:17 33:12,13 36:5,9,18 38:16 40:3,12 42:8 44:17 47:4 <b>meeting</b> 21:9 33:12,18,24 34:2,9 <b>meetings</b> 10:12 20:19 21:12 <b>melanoma</b> 50:13 <b>Melody</b> 1:23 66:15 68:24 69:1 <b>member</b> 10:4,7 10:9,18 13:22 15:6 16:5 29:9 55:6,8 <b>members</b> 20:24 21:11,23 24:24 <b>membership</b> 13:2 <b>message</b> 5:11 22:18 35:18 36:3 <b>messages</b> 33:15 35:21 <b>met</b> 26:2 <b>Mhill@pryor...</b> 67:11 <b>mi</b> 31:3 <b>Michelle</b> 43:8 <b>middle</b> 52:9 <b>Mike</b> 33:12 36:17 53:13 54:24,25 55:2 58:7 <b>milk</b> 47:12 <b>mind</b> 32:20 <b>Mine</b> 52:24 <b>minority</b> 29:18 31:4
--	--	---	--	---

<b>minute</b> 44:19	40:24 44:8	19:15 21:1	29:14 30:1	12:18,20 31:4
<b>MINUTE(S)</b>	<b>new</b> 5:11 36:22	23:25 28:6	31:9,19 35:2	32:15 34:14,17
67:3	37:1,2 52:24	29:1 33:21	36:3,8 38:12	35:1 36:15
<b>minutes</b> 51:11	<b>niece</b> 50:11	38:6 39:3,4	41:12,15,16,24	43:21
59:14	<b>nonmember</b>	41:12 58:23	43:3,3 47:9	<b>partially</b> 22:9
<b>mischaracteri...</b>	13:4 20:17	60:23 61:2	48:5,9 50:4,4	<b>particular</b> 11:9
38:8 60:10	<b>nonunion</b> 21:11	<b>objections</b> 59:9	52:5,8 53:3	<b>particularly</b>
<b>Mol</b> 43:9	25:5	<b>objector</b> 14:23	56:18	26:23 33:11
<b>moment</b> 34:13	<b>normally</b> 39:17	43:14	<b>onboard</b> 12:17	<b>parties</b> 3:2 67:7
<b>money</b> 47:12	57:10	<b>objectors</b> 13:1	<b>once</b> 18:4 28:18	68:16
60:6	<b>North</b> 3:5,15	15:8 17:16,20	<b>one-hour</b> 61:12	<b>partner</b> 45:11
<b>Monk</b> 1:23	67:10,21	18:9 19:8,9,10	<b>ones</b> 40:11	<b>party</b> 67:1
66:15 68:24	<b>Northern</b> 1:1	19:25 20:11	<b>operating</b> 53:13	<b>pass</b> 16:15 61:17
69:1	6:7 66:1	22:25 23:11	<b>operations</b>	<b>passed</b> 57:9
<b>months</b> 40:21	<b>Northwest</b> 27:4	24:5 25:6 46:6	24:17	<b>passing</b> 58:3
<b>movement</b> 13:1	<b>NOTARY</b> 65:4	56:6 60:22	<b>opinion</b> 60:5,13	<b>passionate</b> 27:13
14:20,23	<b>note</b> 26:12	<b>obviously</b> 29:15	60:14,15,17	33:2
<b>multiple</b> 36:20	<b>noted</b> 41:12 64:5	<b>Occasionally</b>	<b>opportunity</b>	<b>patience</b> 61:15
40:7,12	<b>notice</b> 52:22	12:14	29:7,8 30:23	<b>pattern</b> 47:11
	<b>number</b> 20:11	<b>October</b> 5:10,11	50:8	<b>Paulo</b> 3:14 6:15
<b>N</b>	42:23 53:17	5:14 33:6	<b>opposed</b> 43:15	6:22 7:20 9:16
<b>N</b> 3:1	<b>numbered</b> 1:21	<b>offer</b> 17:21 18:9	<b>oral</b> 1:12,18	9:17 51:1
<b>name</b> 7:11,13	<b>O</b>	18:14,21,23	66:19	67:20
25:18 47:5	<b>o'clock</b> 39:23	<b>offered</b> 19:11	<b>order</b> 23:2	<b>pay</b> 11:3 60:16
63:2 64:20	<b>O'Grady</b> 42:5	<b>offering</b> 19:12	<b>original</b> 68:12	60:19
<b>names</b> 23:18	45:5	<b>office</b> 6:24 58:2	<b>outcome</b> 68:18	<b>paying</b> 8:10,11
<b>Naomi</b> 39:2,7	<b>oath</b> 8:17,19	64:24	<b>owed</b> 40:14	8:12 9:7
56:21	20:1 64:17	<b>officer</b> 53:15	<b>P</b>	<b>pays</b> 13:23
<b>National</b> 3:9	<b>object</b> 9:13	55:13 66:19	<b>P</b> 3:1,1	<b>pe</b> 23:18
67:13	15:13 16:8,23	67:5	<b>page</b> 5:1,6,7,9	<b>pen</b> 27:12
<b>nature</b> 58:1	18:1,11 19:17	<b>officer's</b> 68:10	45:9 53:17	<b>people</b> 15:8
<b>navigate</b> 36:21	21:3 23:14,14	<b>offices</b> 3:21 11:7	<b>PAGELINE</b>	24:20 25:5
<b>need</b> 11:21,22	28:22 29:24	68:3	63:3	27:4,5,14
44:19 49:4	32:3 34:5	<b>oh</b> 9:20 25:13	<b>pages</b> 46:7	31:15 32:17
58:6,20 61:4	37:21 38:19	28:16 47:2	<b>paid</b> 22:10,11	36:20 38:1,1
61:25	41:10 42:12,15	51:25,25 54:25	<b>pal</b> 27:12	38:23,23 39:1
<b>negotiates</b> 39:10	42:16 43:18	56:11,14	<b>paper</b> 31:21	40:3,10 43:11
39:16	44:21,23 45:16	<b>okay</b> 8:17 10:17	<b>paragraph</b>	44:19 45:14
<b>negotiating</b>	46:13 54:7,9	10:23 11:19,24	27:25 28:23	48:13 50:23
39:12	59:16,18 60:9	12:4,8,10	31:6,12,13	<b>period</b> 42:1
<b>negotiations</b>	<b>objecting</b> 15:8	14:25 16:19	34:15,19,22	61:16
39:9 58:2	16:5 20:24	17:13,24 18:10	52:9	<b>permits</b> 24:4
<b>neither</b> 68:14	<b>objection</b> 9:18	20:12,22 25:14	<b>Paralegal</b> 4:8	<b>pers</b> 48:22
<b>nephew</b> 50:12	15:15 18:13,18	25:20 26:4	<b>part</b> 11:11 12:8	<b>person</b> 37:25
<b>never</b> 20:5,6		27:10 28:8		38:15,16,25

39:10,15 64:19 <b>personal</b> 31:20 48:17,23 53:23 <b>personally</b> 64:16 <b>Phoenix</b> 25:24 26:3 <b>phone</b> 69:3 <b>phrases</b> 32:18 <b>Plaintiff</b> 1:4,20 3:3 66:4 67:8 68:11 <b>plate</b> 26:19 <b>play</b> 29:17 <b>please</b> 6:11 7:11 23:22 28:25 30:25 42:24 45:10 59:20 62:1 <b>PLLC</b> 4:1 68:7 <b>Pmckeeby@r...</b> 3:17 67:22 <b>point</b> 16:17 40:13 <b>policies</b> 22:6,13 <b>policy</b> 9:11 36:6 37:14 40:4,16 <b>portion</b> 26:5 <b>position</b> 9:23 12:13,15 24:14 24:18 61:11 <b>possibly</b> 41:1 <b>posting</b> 36:20 <b>posts</b> 28:11 42:8 43:12 47:4,10 <b>power</b> 16:4 <b>prepared</b> 49:19 <b>preparing</b> 68:11 <b>PRESENT</b> 4:5 <b>president</b> 15:6 24:15 35:19 37:18 <b>President's</b> 5:11 36:3 <b>previously</b> 49:19 <b>pro</b> 48:12	<b>probably</b> 15:22 26:2 59:25 60:1 <b>problems</b> 14:1 16:5 55:6 <b>Procedure</b> 2:2 <b>proceeding</b> 68:17 <b>process</b> 37:19 47:22,24 48:8 48:16 59:1 61:8,9 <b>processes</b> 48:13 <b>produce</b> 16:20 18:7 48:24 50:22 <b>produced</b> 1:19 18:2,3 50:21 <b>production</b> 48:19 <b>promised</b> 50:15 <b>pronounce</b> 25:17 <b>prospect</b> 48:7 <b>protect</b> 23:12 <b>prove</b> 19:12 <b>proved</b> 64:17 <b>provide</b> 18:10 19:7,12 <b>provided</b> 43:6 43:12 55:19 <b>provisions</b> 2:2 <b>Pryor</b> 3:4,5 5:5 6:13,13,17,20 7:10,13 16:25 18:15 20:8 21:6,9,15,24 25:3 27:25 30:1 32:7 34:17,21 41:5 41:9,15,19,24 42:25 44:6 50:25 51:25 52:3,16,19,24 53:3,6,10 57:5	59:7 61:10,23 62:7 67:3,9 <b>PUBLIC</b> 65:4 <b>pull</b> 52:4 <b>pulled</b> 52:14 55:24 <b>pulling</b> 51:22,24 <b>punished</b> 61:1 <b>purposes</b> 64:22 <b>pursuant</b> 2:1 67:4 <b>purview</b> 24:21 <hr/> <b>Q</b> <b>question</b> 9:14,19 10:24 15:16 16:9,24 18:2 18:15,20 19:18 21:4,14,16 23:5,15 24:25 25:2,3 29:16 29:25 30:3,10 30:13 32:4 34:6 35:1 37:22 38:20 41:7,14 42:16 43:21 44:24 45:17 49:4 54:11 60:10 <b>questions</b> 9:3 12:9 14:4 28:25 59:13 61:18 62:3 <b>Quickies</b> 5:12 <b>quit</b> 60:20 <b>quite</b> 22:13 <hr/> <b>R</b> <b>R</b> 3:1 <b>racist</b> 29:22 30:4 30:7,20 31:7,8 <b>raised</b> 17:3 <b>ran</b> 11:11 <b>RBF</b> 56:17 <b>reach</b> 17:20	19:24 28:2 <b>reached</b> 18:9 19:10 20:11 40:24 <b>reaches</b> 15:6 <b>read</b> 5:13 12:8 15:3 21:25 22:1,1,2 26:7,8 26:22 27:5,18 28:20 30:14,15 30:16 31:1,5,6 32:15 34:3,10 34:17 35:2,5,6 40:1,1 56:14 56:23 62:8 64:3 <b>reading</b> 30:5,12 <b>really</b> 8:14,16 19:21 22:3,14 33:8 40:14 45:4 48:21 49:11,19 55:9 <b>reason</b> 26:19 33:4 63:3 <b>recall</b> 11:8,10,18 14:10 17:23 20:20,21 21:19 27:20,22 28:4 32:11 33:16,17 33:17 36:3,6,7 36:14,19 37:9 37:11 54:18 55:16,20 57:11 58:4 <b>recalled</b> 55:20 <b>receive</b> 12:12 13:2 38:2 47:21 <b>received</b> 31:25 42:7 44:8,15 47:17 <b>Recess</b> 51:14 <b>recipient</b> 45:25 <b>recognize</b> 26:4 <b>record</b> 2:2 6:2	6:11 51:1,13 51:16 61:11,21 62:1,5 66:20 67:7 <b>Reed</b> 3:15 67:20 <b>referenced</b> 56:17 <b>referencing</b> 31:4 31:5 <b>referring</b> 13:7 14:6 44:12 45:12 <b>regarding</b> 16:11 47:4 <b>Registration</b> 69:1 <b>regular</b> 12:12 <b>regularly</b> 35:25 36:2 <b>reimbursement</b> 13:2 <b>reinforce</b> 33:15 <b>related</b> 15:22 68:15 <b>relations</b> 39:9 45:7,10,13 46:5,11 47:2 58:11,16,19,21 <b>rely</b> 25:14 <b>remem</b> 57:17 <b>remember</b> 11:16 14:8 17:12,17 20:7,10 22:14 22:24 23:7,9 23:10,13,17,18 23:18,19,21,24 24:1,2 26:7 27:19 28:7,15 31:18 36:15,16 41:1,4 42:20 42:21 43:23 44:2,14 54:2,4 54:12,14,15 57:7,8,12 60:7 60:8
--	---	---	---	--

<b>Remind</b> 56:1	<b>rid</b> 32:17	26:5 52:1,5,15	<b>serving</b> 10:14	12:25 14:15
<b>removed</b> 11:15	<b>right</b> 3:9 6:19	54:19	11:2	20:14 33:12
<b>repeat</b> 8:2 49:4	16:22 20:25	<b>screenshots</b>	<b>share</b> 40:25 50:7	63:2 64:3,10
59:20	23:13,24 26:7	47:10	52:1,4,25 53:3	64:16 66:12,18
<b>repeated</b> 49:8	26:17 35:9	<b>scroll</b> 22:17	<b>sheeple</b> 26:20	<b>soon</b> 29:19
<b>report</b> 9:21	38:18 40:6,19	<b>seal</b> 64:24	<b>Shipman</b> 26:18	<b>sorry</b> 6:18 7:23
<b>reported</b> 1:24	43:2 44:1,22	<b>search</b> 18:6	<b>short</b> 61:16	8:23 9:16 14:4
28:20 29:23	47:7 50:25	48:17,20,23	<b>shorthand</b> 1:25	14:25 25:13
<b>reporter</b> 6:11	52:6,13,14	<b>searching</b> 46:7	66:15	36:24,25 39:23
36:24 61:22	61:10,15 67:13	<b>see</b> 7:24,25	<b>show</b> 11:21 12:4	48:20,22 51:25
62:6,13,16	<b>rights</b> 23:2,12	11:25 12:6	16:22	62:2
66:16	41:16,17,19,23	16:21 17:6,25	<b>showing</b> 28:19	<b>source</b> 28:1
<b>Reporter's</b> 5:7	<b>Road</b> 3:10 67:14	18:8 20:12,13	<b>sic</b> 41:4	<b>Southwest</b> 1:6
66:11	<b>Rockwall</b> 3:6	22:20 31:8	<b>sidebar</b> 28:22	3:13 4:6,8,8
<b>REPORTING</b>	6:18 67:10	35:21 37:12	<b>sign</b> 62:9	6:4,23 7:16,22
69:1	<b>role</b> 11:2 47:1	40:4 42:21	<b>signature</b> 5:6	7:22 8:5,11,13
<b>reports</b> 54:25	<b>roles</b> 47:1	47:3 53:19	61:22 62:6	9:7,10,24 10:4
<b>represent</b> 6:14	<b>RPR</b> 68:24	54:19 58:3	63:1 64:4	15:7 16:19
6:23 7:14 8:5	<b>rules</b> 2:1 22:6	<b>seeing</b> 45:3	66:24	17:1,21 18:5
13:4		54:14 55:16	<b>Sims</b> 54:24,25	18:24 19:13
<b>representation</b>	<b>S</b>	<b>seen</b> 26:9,23	55:2 58:7	20:25 21:10,12
20:6	<b>S</b> 3:1 4:1 68:6	32:1 45:24	<b>sincerely</b> 9:9	22:11 24:5
<b>representative</b>	<b>San</b> 3:5 67:10	<b>sees</b> 9:10	19:20	28:19 36:5
20:18	<b>saw</b> 55:18	<b>send</b> 32:24	<b>single</b> 43:14	37:6,14 45:22
<b>represented</b>	<b>saying</b> 17:8,9	46:16 47:18	<b>sir</b> 16:7 24:19	46:8 59:15,20
7:17	19:24 20:2	53:22,22 62:9	26:11 55:7	59:22 60:3,20
<b>representing</b> 7:1	21:11 32:16	<b>sending</b> 31:23	58:12	66:6 67:19
7:4 8:4	42:6 46:3 58:5	<b>sends</b> 26:12 33:6	<b>sit</b> 24:3,10,13,25	<b>Southwest's</b>
<b>request</b> 21:18,21	<b>says</b> 12:25 13:6	35:24 53:21	26:1	60:7
21:22,24 62:10	13:10,15,24	<b>senior</b> 4:6 12:16	<b>slates</b> 11:6	<b>space</b> 26:3
<b>rereading</b> 34:12	14:7,14,18,25	24:18 29:9	<b>slightly</b> 61:13	<b>spawns</b> 27:3
<b>research</b> 16:16	15:7,18 20:14	<b>sent</b> 14:13 26:6	<b>small</b> 13:2	<b>speak</b> 14:3
<b>reserve</b> 41:16	20:18 26:17	28:13 31:16,20	<b>Smith</b> 3:15	50:19
<b>reserving</b> 41:23	27:3,16,16	39:22,23 40:1	67:20	<b>specific</b> 11:9
<b>resign</b> 13:1	31:14,19,20	46:5,10 53:25	<b>social</b> 5:11 27:21	45:9
<b>respond</b> 54:20	32:8 33:5,8,19	54:3 55:24	27:24 28:1,3	<b>specifically</b> 22:7
<b>response</b> 14:10	36:8 45:8 47:4	56:6,11,19	28:10 31:12	<b>specifics</b> 24:2
14:13 15:9	51:21 52:10,24	57:13,21	32:16 33:11,13	57:11
20:14,23 31:17	<b>scenario</b> 60:1	<b>seriously</b> 8:19	36:5,9,18	<b>spend</b> 50:8
53:18 54:17	<b>scenes</b> 33:10	<b>serve</b> 13:23,25	38:16 40:3,12	<b>spending</b> 50:10
<b>restate</b> 23:22	<b>schedule</b> 35:4	<b>served</b> 46:25	42:8 44:16	<b>spoken</b> 57:16
<b>result</b> 22:22	50:21	<b>serves</b> 10:12	47:4	<b>Springfield</b> 3:10
<b>return</b> 66:25	<b>schedules</b> 50:24	27:2	<b>somebody</b> 58:17	67:15
<b>review</b> 42:9	<b>school</b> 49:14	<b>service</b> 19:7	<b>Sonya</b> 1:13,19	<b>standard</b> 37:14
54:22,22 55:21	<b>screen</b> 21:25	<b>services</b> 37:18	5:4 6:2 7:6,12	37:19,24

<b>starts</b> 58:16 <b>state</b> 1:24 6:9 7:11 44:3 51:1 64:12 65:5 66:16 <b>stated</b> 2:2 61:11 <b>States</b> 1:1 6:6 66:1 <b>Step</b> 47:22,22 48:8,8 <b>Stephensen</b> 55:25 <b>stepped</b> 26:18 <b>steps</b> 42:9 47:19 <b>stipulations</b> 6:10 <b>Stone</b> 11:11 12:5 20:13 33:7 35:19 36:4 38:14 39:11 40:2,18,22 57:2 <b>Stone's</b> 11:24 37:5 56:9,11 56:23 <b>stop</b> 51:10 60:8 <b>strange</b> 42:4 <b>strategy</b> 12:17 <b>Street</b> 3:15,21 4:2 67:21 68:3 68:7 <b>strikes</b> 35:8 <b>struck</b> 35:6 <b>styled</b> 6:3 <b>subject</b> 26:18 <b>submitted</b> 66:22 <b>subpoena</b> 51:8 <b>subscribed</b> 64:20 <b>subsequently</b> 10:3 <b>Suite</b> 3:10,16 67:15,21 <b>summer</b> 33:13 <b>summit</b> 50:20	<b>support</b> 17:7 50:17 <b>sure</b> 8:3 10:22 17:6 29:6,22 32:22 47:1 49:12 <b>surely</b> 19:9 35:7 44:15 <b>Suzanne</b> 55:24 56:20,20 <b>SWA</b> 42:2 <b>swear</b> 6:12 <b>swearing</b> 17:5 <b>sworn</b> 1:20 7:7 41:21 66:18 <hr/> <p style="text-align: center;"><b>T</b></p> <hr/> <b>take</b> 8:19 29:14 33:1 41:19 46:8,19 47:10 51:4,9 59:9 <b>taken</b> 1:21 51:7 67:6 68:17 <b>Talbert</b> 25:18 46:5 48:18,25 <b>talk</b> 40:22,24 43:5 58:3 <b>talked</b> 41:2 43:13 44:16 52:8 <b>talking</b> 21:5 27:6,20 28:3 29:7,9,13,15 31:11,12 36:7 40:21 47:7 49:25 50:3 54:15 57:25 <b>target</b> 32:17 <b>targeted</b> 27:17 27:20 28:4 29:5 38:17 42:11 44:17 46:9 <b>targeting</b> 31:15 <b>team</b> 16:16 25:8	27:2 28:11 39:9 46:16,17 47:18 57:9,13 57:22 58:7,9 58:11,13,16,17 58:20 <b>tell</b> 11:19 12:22 28:9 30:20,23 31:6 33:24 34:23,25 40:8 40:9 49:22 51:21 53:12,24 56:22 57:1,21 57:23 58:20 <b>telling</b> 34:3,8 44:12 <b>ten</b> 51:10 <b>termination</b> 55:16,22 <b>testified</b> 7:7 45:23 <b>testimony</b> 8:22 9:1 38:9 44:7 60:10 66:20 67:5 <b>Texas</b> 1:1,24 2:1 3:6,16,22 4:2 6:7,24 66:1,16 67:10,22 68:4 68:8,24 69:2 <b>Thank</b> 17:2 32:9 54:20 61:19 62:7 <b>thanks</b> 14:18 51:11 <b>thing</b> 23:20,23 31:21 <b>things</b> 27:14 60:7,8,20 <b>think</b> 8:13 21:20 30:6,6 31:7 34:24 37:24 40:21 43:25 45:1,19 47:11 52:12,13 55:23	60:24,25 61:12 61:14 <b>third</b> 53:10 <b>thou</b> 24:24 <b>thought</b> 52:4 <b>thousands</b> 24:20 <b>threat</b> 29:20 <b>three</b> 50:12 59:14 <b>time</b> 6:8 7:25 8:24 10:3 14:22 16:18 17:16 23:19 24:7 30:5,15 35:4 38:3,13 39:12,24 40:8 40:9,13 41:2 42:1 45:3,8 48:21 50:8,11 50:16 54:13 55:5 59:6,11 59:21 61:17,19 67:1,5 <b>time's</b> 53:10 <b>times</b> 41:1 54:6 <b>title</b> 56:2 <b>today</b> 7:17,25 8:5,22 9:1,4 14:19 24:3,10 24:14,14 25:1 26:1 <b>told</b> 16:22 41:3 44:18 51:21 52:10 <b>tomorrow</b> 14:3 <b>tool</b> 33:14 <b>topic</b> 32:25 33:9 <b>topple</b> 47:12 <b>totally</b> 31:21 <b>tough</b> 48:21 <b>town</b> 50:9,21,22 <b>trail</b> 31:21 <b>transcript</b> 66:19 66:22 68:12 <b>transparent</b>	22:4 <b>Transport</b> 1:6 3:19 6:4 7:2 66:7 68:1 <b>traveling</b> 50:18 <b>treatment</b> 50:14 <b>trial</b> 16:21 18:8 33:7 42:25 49:17 50:5 51:3,8,20 59:10 <b>tried</b> 58:3 <b>true</b> 29:10 34:11 35:7 64:5 66:20 <b>trust</b> 61:9 <b>trusted</b> 31:22 <b>truth</b> 22:15 34:3 34:8 <b>truthfully</b> 9:3 <b>try</b> 14:2 27:11 35:5 40:25 43:4 52:25 <b>trying</b> 14:1 19:22 26:19 34:24 36:21 45:13 47:11 49:10 54:4 59:16 <b>tumor</b> 26:20 <b>twen</b> 51:20 <b>twice</b> 35:3 <b>two</b> 7:1 11:6 49:15 59:14 <b>TWU</b> 7:5 13:4 20:17 <b>typically</b> 38:2,4 <hr/> <p style="text-align: center;"><b>U</b></p> <hr/> <b>un</b> 32:23 <b>unavailable</b> 51:5,6 <b>unco</b> 29:20 <b>uncommon</b> 32:23
--	---	---	---	---

<b>uncompound</b> 32:7	<b>use</b> 31:13 32:16	<b>wasn't</b> 14:20	3:19 6:4 7:2	<b>10821</b> 69:1
<b>undergoing</b> 50:12,13,14	<b>V</b>	39:12 55:3	66:7 68:1	<b>11</b> 5:10
<b>underst</b> 19:16	<b>vague</b> 19:18	61:14	<b>working</b> 10:21	<b>11:05</b> 51:16
<b>understand</b> 8:21	23:15	<b>way</b> 12:11 17:15	10:21 36:4	<b>11:17</b> 1:22 61:21
8:25 13:7 15:5	<b>Van</b> 53:13	31:19,24 32:19	38:15	62:5,18
18:12,19,21,25	<b>VdV</b> 33:13	35:5 39:11	<b>works</b> 8:15 9:9	<b>12th</b> 50:3
19:2,3,21,23	51:21 52:10	44:3 45:5	39:7	<b>13</b> 5:10,10,11,14
22:5 24:7,9	53:12	49:21 55:2	<b>worries</b> 52:2	<b>13th</b> 33:6
41:22 59:12	<b>Ven</b> 53:13	56:24 58:8	<b>wouldn't</b> 19:9	<b>14</b> 5:11
<b>understanding</b> 9:7	<b>versus</b> 6:3	<b>we'll</b> 17:6 18:6	20:25 37:20,24	<b>1404</b> 69:2
<b>understood</b> 10:22 23:2	<b>vice</b> 24:15 37:17	22:17 30:1	44:18 58:18,18	<b>1500</b> 3:16 67:21
27:10 43:2	<b>Videoconfere...</b>	41:16 59:10	<b>wow</b> 35:7	<b>16</b> 54:19
49:12	1:12,18,23 3:2	62:8	<b>wrap</b> 59:13 61:5	<b>16,000</b> 24:23
<b>union</b> 1:7 3:19	<b>Videographer</b>	<b>we're</b> 16:21 18:4	<b>write</b> 46:3	<b>19</b> 5:11 35:12,14
6:5 7:2 10:4,9	4:5 6:1 51:12	18:4,14,19,21	<b>wro</b> 46:22	35:18 39:22
10:14,18,25	51:15 61:20	19:5,5 30:16	<b>wrong</b> 52:6	<b>1999</b> 69:2
13:2,8,21,22	62:4	59:9	<b>wrote</b> 15:19	
14:5,7 15:6,9	<b>VIDEOTAPED</b>	<b>we've</b> 31:25 51:7	29:16 40:9	<b>2</b>
16:5,6 19:10	1:12,18	53:9	57:24	<b>2</b> 5:2 47:22 48:8
21:23 22:6,9	<b>view</b> 51:6	<b>week</b> 32:25	<b>X</b>	51:16
22:12 24:5,6	<b>viewing</b> 8:22 9:1	49:24 50:9,18	<b>Y</b>	<b>2001</b> 10:2,8
24:24 25:4	<b>violation</b> 9:11	<b>went</b> 10:19	<b>yeah</b> 21:13	<b>2004</b> 10:8
27:2 32:18	<b>violations</b> 40:3	43:11	30:24 34:20	<b>2007</b> 26:3
35:19 39:11,16	<b>Virginia</b> 3:10	<b>weren't</b> 17:8	41:3,3 46:22	<b>2008</b> 26:3
43:14,15,15	67:15	<b>willing</b> 18:5	52:2 56:10	<b>2013</b> 11:5,20
45:14,14 46:6	<b>voice</b> 29:19	<b>witness</b> 1:19,25	59:7 62:8	55:6
47:13 55:2,6,8	<b>volume</b> 7:24	6:12 9:16,20	<b>year</b> 10:1 11:9	<b>2014</b> 5:10,10,11
55:11 58:1	23:8 40:11	28:25 37:1	<b>years</b> 10:7 23:24	5:14 11:5,20
59:17,17,23	<b>VS</b> 1:5 66:5	41:6,13,21	49:15 55:4	12:5,15,16
60:4,21 62:1	<b>W</b>	51:3 52:23	57:7	14:22 15:19
62:14 66:7	<b>wa</b> 56:2	53:8 61:17	<b>yesterday</b> 62:10	22:5 23:9,10
68:1	<b>wait</b> 18:8 41:5	63:2 66:18,21	<b>Z</b>	25:21 55:6
<b>United</b> 1:1 6:6	44:19 57:23	66:23,24	<b>Zoom</b> 1:23 3:2	<b>2017</b> 5:12,13,13
66:1	<b>wall</b> 45:9	<b>Witness's</b> 5:6	53:3	5:14,15 37:9
<b>unknown</b> 20:11	<b>want</b> 17:4 20:15	<b>WNCO.com</b>	<b>0</b>	39:12 54:20
<b>untrue</b> 35:8,10	21:11 28:20	14:15	<b>01</b> 67:3	<b>2022</b> 1:14,22 6:2
<b>untruthful</b> 20:1	30:14 32:17	<b>wor</b> 45:6	<b>1</b>	63:2 66:13,23
<b>upcoming</b> 29:21	35:15 47:13	<b>work</b> 3:9 7:15	<b>1</b> 47:22 48:8	66:25 68:21
32:18	<b>wanted</b> 10:22	7:16 23:8 25:8	<b>10/21/2022</b>	<b>21</b> 5:12 42:1,25
<b>upset</b> 57:21,23	14:1 49:12	25:9 29:6	68:25	43:1 53:16,17
58:5	<b>wants</b> 37:15	40:11 45:10	<b>10:51</b> 51:13	<b>214.232.9015</b>
	46:8 62:14	46:17 67:13		3:22 68:4
	<b>warning</b> 40:3	<b>worked</b> 39:8		<b>22</b> 5:13,13 37:9
		45:6		<b>22160</b> 3:10
		<b>Workers</b> 1:6		67:15

<b>22nd</b> 39:25 42:3	<b>63</b> 5:6			
<b>23</b> 5:14,15	<b>6351</b> 47:20			
<b>23rd</b> 41:25 42:5	<b>655</b> 42:22			
<b>24</b> 1:14,22 5:12	<b>66</b> 5:7,13 37:5,8			
63:2 66:13	39:22			
<b>24th</b> 6:2	<b>67</b> 5:14			
<b>26</b> 5:14 33:8				
51:17,18,20	<b>7</b>			
52:9	<b>7</b> 5:5			
<b>27th</b> 68:20	<b>703.321.8510</b>			
<b>28</b> 66:25	3:11 67:16			
<b>2850</b> 3:15 67:21	<b>73</b> 5:15			
<b>29</b> 66:23	<b>75087</b> 3:6 67:10			
	<b>75201</b> 3:16			
<b>3</b>	67:22 69:2			
<b>3</b> 5:10 11:22,23	<b>75226</b> 3:22 4:2			
11:24	68:4,8			
<b>3:17-cv-02278...</b>	<b>76</b> 53:18			
1:6 6:6 66:6				
<b>30</b> 5:10 14:14	<b>8</b>			
15:19	<b>8001</b> 3:10 67:14			
<b>302</b> 3:5 67:10	<b>80s</b> 27:4			
<b>3301</b> 3:21 4:2	<b>84</b> 47:20			
68:3,7	<b>888.988.5317</b>			
<b>34</b> 50:13	69:3			
<b>35</b> 5:12	<b>8th</b> 50:1			
<b>3613</b> 68:24				
<b>37</b> 5:13	<b>9</b>			
<b>38</b> 5:13 39:19,20	<b>9</b> 39:23			
<b>39</b> 5:13	<b>9:57</b> 1:22 6:8			
	<b>972.771.3933</b>			
<b>4</b>	3:6 67:11			
<b>44</b> 42:2				
<b>4484</b> 42:2				
<b>5</b>				
<b>51</b> 5:14				
<b>556</b> 1:7 3:19 6:5				
7:2,5 10:5 11:7				
13:4,4,5,25				
20:18 22:6				
66:8 68:1				
<b>5th</b> 49:25 50:3				
<b>6</b>				
<b>600</b> 3:10 67:15				